SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

MONDAY, APRIL 4, 2005

8:30 A.M.

(PAGES 4645 THROUGH 4698)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 4645

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I N D E X

Note: Mr. Sneddon is listed as “SN” on index.
Mr. Zonen is listed as “Z” on index. Mr. Auchincloss is listed as “A” on index.
Mr. Nicola is listed as “N” on index. Mr. Mesereau is listed as “M” on index.
Ms. Yu is listed as “Y” on index. Mr. Sanger is listed as “SA” on index.
Mr. Oxman is listed as “O” on index.

PLAINTIFF’S
WITNESSES DIRECT CROSS REDIRECT RECROSS
SALAS, Jesus 4649-A
(Cont’d)

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3 PLAINTIFF'S NO. DESCRIPTION I.D. EVID.
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Santa Maria, California
Monday, April 4, 2005
8:30 a.m.

THE COURT: Good morning.
THE JURY: (In unison) Good morning.
COUNSEL AT COUNSEL TABLE: (In unison)
Good morning, Your Honor.
THE COURT: Are you all feeling like I am?
A JUROR: Probably.
THE COURT: That damn time change.
(Laughter.)
THE COURT: All right. Counsel, call your
next witness.
MR. AUCHINCLOSS: Thank you, Your Honor.
We still have Jesus Salas on the stand.

JESUS SALAS
Having been previously sworn, resumed the
stand and testified further as follows:

THE COURT: Please be seated. You're still
under oath.

DIRECT EXAMINATION (Continued)
BY MR. AUCHINCLOSS:
Q. Good morning, Mr. Salas.
A. Good morning. 4649

Q. I'm not sure exactly where I left off, but
I'd like to begin by going back to generalities
about Neverland.
As far as your relationship with Mr. Jackson
concerning your employment as house manager, can you
characterize the level of control that Mr. Jackson
maintained over Neverland and over the main house?
A. I would say pretty high.
Q. And as far as in terms of how demanding he
could be, could you characterize that as well?
MR. MESEREAU: Objection. Vague;
foundation.
THE COURT: Sustained.
MR. AUCHINCLOSS: I can be more specific.
Q. How demanding he was about the level of his
service that was provided to him by his employers.
MR. MESEREAU: Objection. Vague;
foundation.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Who was it that
determined what -- which guests -- well, let me back
up.
How was it determined, if you know, whether
a guest would be coming to Neverland or not?
A. I did not know that.
Q. Okay. And would guests of Neverland be
allowed to bring their own guests to Neverland; do
you know? 4650

MR. MESEREAU: Objection. Calls for speculation; foundation.
MR. AUCHINCLOSS: If you know.
THE COURT: The objection is overruled.
You may answer.
THE WITNESS: I do not know that either.
Q. BY MR. AUCHINCLOSS: Okay. The guests of Neverland would be whose guests?
MR. MESEREAU: Objection. Foundation; calls for speculation.
THE COURT: Foundation is sustained.
Q. BY MR. AUCHINCLOSS: Do you know if people were allowed on Neverland without Mr. Jackson's permission?
A. I believe that if they weren't allowed by Mr. Jackson, I don't think they would come in.
Q. Okay. And do you know who would determine how long a guest was allowed to stay at Neverland?
MR. MESEREAU: Objection. Foundation; calls for speculation.
MR. AUCHINCLOSS: It's a foundational question.
THE COURT: You may answer that "yes" or "no."
THE WITNESS: I believe they didn't have no time --
THE COURT: Just a moment. He's just asking if you have the knowledge. He's not asking you what 4651

1 the knowledge is. Do you know who determined how
2 long a guest could stay? Yes or no.
3 THE WITNESS: No, I didn't.
4 Q. BY MR. AUCHINCLOSS: How were children
5 treated at Neverland?
6 MR. MESEREAU: Objection. Vague;
7 foundation.
8 THE COURT: Sustained.
9 Q. BY MR. AUCHINCLOSS: Can you -- when you
10 were at Neverland, Mr. Salas, when you were house
11 manager, did you observe at any time Mr. Jackson
12 with child guests?
13 A. Yes, I did.
14 Q. And did Mr. Jackson ever inform you of the
15 level of the service he expected of his child
16 guests?
17 MR. MESEREAU: Objection. Leading;
18 foundation.
19 THE COURT: Overruled.
20 You may answer.
21 THE WITNESS: He was -- he always expected
22 the best, to be treated the best.
23 Q. BY MR AUCHINCLOSS: If a child wanted
24 something at Neverland, had a request, or let's say
25 food, a movie, any special request of that nature,
26 would that request be fulfilled by the employees?
27 MR. MESEREAU: Objection. Vague;
28 foundation; calls for speculation. 4652

THE COURT: Overruled.
THE WITNESS: Yes.
Q. BY MR. AUCHINCLOSS: Do you know if that's the way Mr. Jackson wanted it?
A. That is correct.
Q. How do you know that?
A. Because of what he told me, that -- whatever the guests needed, we needed to provide that for them.
Q. And did you notice whether or not this level of service or treatment as far as the children went, did you notice if it affected those kids' behavior in any way?
MR. MESEREAU: Objection. Vague; foundation.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Did you ever have a chance to observe the children -- well, let me ask you this: Were the children basically given whatever they wanted?
MR. MESEREAU: Objection; leading.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Mr. Salas, please characterize for me, if you would, in general, the level of service and -- well, I think you've said before that the children were allowed the best treatment, the best service, true?
A. That is correct. 4653

Q. Give me an example. What are you talking about when you say that?
A. Well, the best service I'm talking about, if they wanted to see a movie and have their meal at the theater or any of that kind of stuff, I mean, they -- I would make sure that they would get it that way. Or if they wanted to eat like anywhere else, if they wanted to eat. If guests called me, or the kids called me, they wanted to eat in the train depot, I would make sure that that's where they get their meal, or whatever they asked for.
Q. If they wanted candy, were they given candy?
A. Absolutely.
Q. If they wanted to play at the amusement park, could they do it?
A. Absolutely.
Q. Were there any rules about that?
A. No.
Q. As far as when and how they would play?
A. Well, there was some rules, you know, for their safety, you know.
Q. Yes.
A. Yes. But other than that, there wasn't any other rules.
Q. Did you have golf carts at Neverland?
A. Yes.
Q. Were the children allowed to use them?
A. There was some kids that they were allowed 4654

to use them.
Q. Who decided who got to use the golf carts?
MR. MESEREAU: Objection; foundation.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Are you aware who allowed the children these privileges of using the golf carts?
A. I had some control on that. We had security or we'd have security there. Many times kids, they were told they weren't allowed to drive certain cars, but they were some kids that they were allowed to drive them.
Q. If Mr. Jackson said, "Let this kid drive a golf cart," would that kid be allowed to drive the golf cart?
A. I would say yes.
Q. Tell me about the theater at Neverland. Could you describe it for me?
A. Well, it's a full-sized theater with a candy bar, ice cream. It's got pretty much anything that a kid can enjoy.
Q. Are there any unusual features as far as where you can watch the movie?
MR. MESEREAU: Objection.
THE WITNESS: Yes, there's an upstairs --
THE COURT: Just a moment.
MR. MESEREAU: Vague and foundation.
THE COURT: Overruled. 4655

You may answer.
Q. BY MR. AUCHINCLOSS: Go ahead.
A. There's an upstairs room where people can sit up there and watch the movie if they want to.
Q. Are there any beds in the theater?
A. Yes, there's two rooms downstairs with two facilities for kids that they can sit in there or lay in bed and watch a movie, if that's what they want.
Q. Is the theater ever closed? I mean, does it have hours, I guess is my question? Is it --
A. Pretty much when Mr. Jackson is on the property, we always kept the place open.
Q. When he had some what?
A. When Mr. Jackson is on property.
Q. I see.
A. We pretty much keep the place open for -- you know, for guests or himself.
Q. All night long?
A. All night long.
Q. Was there one person who made all the main decisions about what happened at Neverland?
A. Well, there is the ranch manager there.
Q. Yes. And was there one person in charge of the ranch manager?
A. Yes.
Q. And did that person make all the main decisions at Neverland? 4656

A. Yes, I believe so.
Q. And who was that?
A. That would be Mr. Jackson.
Q. Now, you spoke a little bit last week about Mr. Jackson's room. Was there -- I believe you testified there was a combination to get in that room?
A. Yes, I did.
Q. Was that combination ever changed?
A. Not too often, but yes, it did.
Q. How often would that combination change?
A. I believe the time that I was there, I think it was about two times that we changed it.
Q. Okay. Now, when you say you were there, are you referring to the time -- the full 20 years you were there, or just the year or so that you were house manager?
A. Just when I was the house manager.
Q. And was there a combination to get into the main house?
A. Yes, there was.
Q. And would that ever change?
A. That one got changed more often.
Q. How often, if you could tell us?
A. I would say that we changed that about every two months, somewhere -- somewhere along that.
Q. Were -- do you know if certain people were given the combinations -- the combination to Mr. 4657

1 Jackson's bedroom?
2 A. Not to my knowledge.
3 Q. Do you know if certain people were given the
4 combination to the Jackson house, the main entry
5 into the home?
6 A. Yes. Pretty much all his guests have access
7 to the house so they had to have the combination.
8 Q. And who would give them that combination?
9 A. Myself personal.
10 MR. AUCHINCLOSS: Okay. All right. Could
11 we have the "Input 4," Your Honor?
12 Q. All right. Mr. Salas, I show you People's
13 Exhibit No. 20. We've shown this to you before.
14 You've identified it as Frank Tyson.
15 You mentioned that at some point during your
16 employment, Mr. Tyson -- you mentioned something
17 about a problem with Mr. Jackson that Mr. Tyson had.
18 Do you recall that testimony?
19 A. Yes, I did.
20 Q. How do you know about that problem?
21 A. I believe about Mr. Jackson's frustrations.
22 Q. Okay. You were present when Mr. Jackson
23 expressed some from frustrations?
24 MR. MESEREAU: Objection; leading.
25 THE COURT: Overruled.
26 You may answer.
27 THE WITNESS: Yes, I did.
28 Q. BY MR. AUCHINCLOSS: And what was -- can you 4658

tell us what he was frustrated about?
MR. MESEREAU: Objection; foundation.
MR. AUCHINCLOSS: I'll withdraw and reask.
THE COURT: Okay.
Q. BY MR. AUCHINCLOSS: Did Mr. Jackson tell you what he was frustrated about? That's yes or no.
A. Yes.
Q. What -- did Mr. Jackson tell you what was frustrating him?
A. He did not know about Frank bringing people at Neverland Valley without his permission.
Q. Okay. Bringing guests without Mr. Jackson's permission?
A. Yes.
Q. Who was it that informed Mr. Jackson of this issue?
A. I don't know.
Q. Okay. And you have previously identified People's Exhibit 35 as the Arvizo family; is that right?
A. That is correct.
Q. You recall the time when the Arvizo family visited Mr. Jackson in the year 2003?
A. Yes.
Q. Was this frustration that Mr. Jackson expressed with Mr. Tyson before, or after, or during the time that the Arvizo family was present at Neverland in 2003? 4659

A. That was after the family was there.
Q. After the family left?
A. Yes.
Q. All right. I show you People's Exhibit No. 17. You've previously identified this individual as Dieter.
Tell me, when was the first time you met Mr. -- Dieter, do you know his last name? Maybe I'll ask you that question first.
A. No, I don't remember his last name.
Q. We'll just refer to him as "Dieter." When was the first time you met Dieter?
A. I believe it was early or mid 2002.
Q. Okay. And where did you meet him?
A. I met him at Neverland Valley.
Q. Can you tell me about the circumstances? How is it that you met him, under what circumstances?
A. Well, he came to the ranch as a guest, and stayed there for a while. That's how I met him.
Q. Okay. So, we're in mid 2002. Dieter comes and visits. Do you know how long he visited for?
A. Not exactly sure, but I believe he stayed there for a couple of weeks the first time he came.
Q. Was Mr. Jackson there at the time?
A. Yes, he was.
Q. Was Mr. Jackson there before Dieter came on the property, if you recall? 4660

A. I don't remember.
Q. When Dieter left the property, do you know if Mr. Jackson left with him?
A. I'm not exactly sure if they did. But there was a few times that they left together.
Q. Okay. So Dieter visited the property again after that first time?
A. Yes.
Q. How many times, if you can estimate?
A. Not exactly sure, but he came, I don't know, maybe about three or four times after that. Something like that.
Q. All right. And you said that -- some of those times. Do you know how many times Mr. Jackson left with him, when Dieter left?
A. I don't.
Q. Do you know how many times Dieter arrived on the property with Mr. Jackson, if at all?
A. I would say about a couple times.
Q. Show you People's Exhibit 18, which you've identified as Ronald. Do you know Ronald's last name?
A. I believe his last name is Konister.
Q. Konister?
A. Something like that.
Q. Okay. We'll refer to him as "Ronald." How -- when was the first time you met Ronald?
A. It was at the same time I met Dieter. 4661

Q. Did Dieter come on the property with Ronald in that period, the first visit he came?
A. They both came together.
Q. Did they leave together?
A. Yes.
Q. And when -- did Ronald ever come back to the property after that?
A. Yes, he did.
Q. How many times?
A. He came back about -- I believe about another couple times.
Q. And during the times that he visited the ranch, did Ronald ever come to the ranch with Mr. Jackson?
A. I believe he came once, if I can recall.
Q. Did he ever leave the ranch with Mr. Jackson?
A. I -- I'm going to say no on that one.
Q. Okay. And while Mr. -- while Ronald was on the property, was -- I think you said the first time Ronald came with Dieter, and they were there the entire time together; is that right?
A. That is correct.
Q. During those subsequent visits of Ronald, was Dieter on the property?
A. Yes, he was.
Q. Did you ever see these two men together?
A. Yes. 4662

Q. How often?
A. Daily basis.
Q. Daily basis?
A. Uh-huh.
Q. Did you ever see these two men with Mr. Jackson?
A. Yes, I did.
Q. How often?
A. Oh, I'm going to say at least they try to have a meeting once a day.
Q. Do you know what Ronald's -- well, let me back up.
Do you know what Dieter's relationship was to Mr. Jackson?
A. No, I don't.
Q. Do you know if it was -- dealt with friendship, business, or a combination?
A. I would say it was more business.
Q. Why do you say that?
A. Because of what they were discussing about business in Europe.
Q. You heard them talking about business?
A. Yes.
Q. What about Ronald, how would you characterize Ronald's relationship on the same continuum?
A. Same category.
Q. Mostly business? 4663

A. Mostly business.
Q. During the time that the Arvizo family was on the property, was at Neverland in 2003, did you ever observe Ronald on the property at the same time?
A. Yes.
Q. How about Dieter?
A. The same.
Q. And how long were they on the property when the Arvizos were there, if you know, or can estimate?
A. I'd say about two weeks.
Q. Is that two weeks total, one continuous time, or two weeks total different times?
A. It was one continuous time.
Q. What about Frank, was he on the property during the period of time in 2003 when the Arvizo family was on the property?
A. Yes, he was.
Q. And about how much -- same question, about how much time was he on the property when the Arvizos were there?
A. Well, he was living there. He was all the time there.
Q. Okay. So whenever the Arvizos were on the ranch, Frank was there?
A. Yes.
Q. Have you ever heard of an individual by the 4664

name of Malnik? Malnik?
A. Yes, I did.
Q. Was he a visitor? Was that a man?
A. Yes, it's a man.
Q. Did you meet him?
A. Yes.
Q. Was he ever a visitor at the ranch?
A. At the time that I was there he only came
once, I believe.
Q. For how long?
A. I don't know. A couple weeks.
Q. Was that time that Mr. Malnik visited the
ranch, did that coincide with any time that the
Arvizos were there?
A. Yes.
Q. I'm showing you People's Exhibit 3. You
didn't know this individual's name last week. But
you did recognize him. Was this individual on the
ranch at any time during the period that the Arvizos
were at Neverland?
A. I don't believe he was there around that
time.
Q. Okay. Do you remember if he was there --
you did testify that he had been at Neverland
before?
A. Right.
Q. Was he there before or after the Arvizos
were there, if you recall? 4665

A. I don't recall. He was there before.
Q. All right. Do you know an individual by the name of Zia?
A. Yes.
Q. Who is Zia?
A. My understanding, he is a lawyer.
Q. Have you met him?
A. Yes, I did.
Q. Where did you meet him?
A. At the ranch.
Q. Do you know who he works for?
A. Not exactly. My understanding, he was working for Mr. Jackson.
Q. Was Zia -- well, let me back up. How many times did Zia visit Neverland where you saw him there?
A. I saw him there a couple of times.
Q. Did -- any of the time that Zia was on Neverland, did that coincide with any of the time that the Arvizos were there in 2003?
A. Yes.
Q. Did you ever see Zia during that period of time when he was visiting the ranch in 2003 talking with Mr. Jackson?
A. I believe, yes, they did have a meeting one time.
Q. Okay. Let's talk a little bit about the Arvizos, okay? In 2003, what members of the Arvizo 4666

family were visiting Neverland?
A. It was just the kids and the mother.
Q. Okay. So the three children, Davellin,
Star, Gavin, and the mother?
A. And the mother.
Q. Do you know her name?
A. Janet.
Q. Okay. Did you participate in bringing them
to Neverland in any fashion on that visit, first
visit, in 2003 I'm talking about?
A. Yes, I picked them up at Santa Barbara
Airport.
Q. Okay. And was Mr. Jackson with them at that
time?
A. Yes.
Q. And you drove to Neverland Ranch?
A. That is correct.
Q. Now, you testified that you would stay very
late pursuant to your employment at Neverland.
A. Yes.
Q. And you'd arrive pretty early, around 7:00,
I think you said?
A. That is correct.
Q. Were you in a position to see who spent the
night in Mr. Jackson's room?
A. Yes, I was aware of who was sleeping there.
Q. Okay. And during the time that the Arvizo
boys, or let's say the Arvizo children, were at 4667

Neverland Ranch, can you tell me where the two boys would sleep?
MR. MESEREAU: Objection; vague as to time.
MR. AUCHINCLOSS: I'm talking about the period in 2003. The visit in 2003.
MR. MESEREAU: I repeat the objection. It's vague.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: In 2003, you said that you brought the Arvizo family to Neverland. How long did they stay on that -- on that particular visit?
A. Not exactly sure how long they stayed. But I would say they stayed a week or two, something like that.
Q. And did they -- they then left the ranch for a period of time?
A. Yes.
Q. How long did they leave the ranch for, about, before they came back?
A. I would say about another two weeks.
Q. Okay.
A. Something like that.
Q. And then when they came back to the ranch, how long did they stay?
A. That time, I believe they stayed about another, I would say, two weeks, three weeks. Somewhere around there. 4668

Q. All right. When they left that time, did they return to the ranch?
A. Yes, they came once again.
Q. Okay. And how long did they stay the third time?
A. About another week.
Q. Okay. When they left the third time, how long -- did they ever return to the ranch?
A. That was the last time I saw them.
Q. Okay. Now, this period of these visits that you've just described, of visiting the ranch, leaving, visiting, leaving, visiting, and visiting one third time, over what period of time did all of these visits take, if you can estimate in terms of weeks, months? How many weeks or months did it take for all of these visits to take place?
A. I would say about five weeks, something like that.
Q. All right. Now, tell me how detailed your recollections are about exact dates and exact periods of time concerning this, the visits by the Arvizos.
A. I -- I don't remember the dates, okay.
Q. Okay.
A. It's just --
Q. Are you giving us your best estimates?
A. That is the best.
Q. Are you -- but are you exactly sure about 4669

1 the time periods and the amount of time?
2 A. I'm pretty sure about the time of them being
3 there. But not exact --
4 Q. When you say "the time," do you mean the
5 dates, or the amount of time?
6 A. The amount of time.
7 Q. Okay. So during this period of time that --
8 these three visits that you talked about that the
9 Arvizos visited Neverland, was Mr. Jackson there
10 during that period of time?
11 A. Yes, he was.
12 Q. Do you know if he was there the entire time
13 or if he had periods where he was gone?
14 A. I would say that he was there most of the
15 time. Pretty much all the time.
16 Q. Okay. Are you sure whether or not he -- do
17 you have a specific recollection of whether he left
18 or not and came back; do you know?
19 A. I don't.
20 Q. During the time -- these three visits --
21 during that period of time in which Mr. Jackson was
22 on the property, on Neverland - okay? - can you tell
23 me where the Arvizo boys slept?
24 MR. MESEREAU: Again, vague as to time.
25 Vague as to what visit. Vague as to what portion of
26 the visit.
27 THE COURT: Sustained.
28 MR. AUCHINCLOSS: I can tighten that up. 4670

Q. Let's do them one at a time, okay? We'll do the first one. During the first visit in 2003 of the Arvizo family, during the period of time that Mr. Jackson was on the property, can you tell me where the Arvizo boys slept?
A. There was times that they slept in the guesthouse. Okay. There were times that they sleep with -- with Mr. Jackson.
Q. Okay. And during the time that -- during this second visit when they left and came back, can you tell me, during that second visit, where did the Arvizo boys sleep?
A. That would be about the same. They sleep with Mr. Jackson. Most of the time I believe that they were trying to sleep with Mr. Jackson.
Q. And same question for the third visit.
A. And that's going to be the same answer.
Q. Okay. Now, you said that they had a guest room.
A. That is correct.
Q. Did -- let me ask you, first of all, while you were manager, house manager, did you notice if any other children slept in Mr. Jackson's room, other than the Arvizos?
A. There was some other kids.
Q. Was it unusual for a kid who was sleeping in Mr. Jackson's room to also have a guest room?
A. No, not really. 4671

Q. Did you see Mr. Jackson interact with these children who spent the night in his room?
MR. MESEREAU: Objection; vague.
MR. AUCHINCLOSS: Foundational question.
THE COURT: Overruled.
You may answer.
THE WITNESS: He would spend time, because he would play with them.
Q. BY MR. AUCHINCLOSS: And while -- and I'm just talking about the year that you were house manager. While you were house manager, how often would he play with these children?
A. I would say anytime that he had some spare time he would play with the kids.
Q. Okay. Would it be -- you tell me. Would it be daily?
A. He would try to be with them daily.
Q. As far as the children visiting the ranch, did you notice whether or not Mr. Jackson formed -- appeared to form any special bonds with certain children?
MR. MESEREAU: Objection. Vague; foundation.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Over the period of time, and I'm talking just about the time that you were manager of the ranch, you mentioned that you would see the children play with Mr. Jackson, true? 4672

A. That is correct.
Q. Where would you see them play?
A. Well, they would go to the park. They would go for a walk. They would go bike riding. Or they have quads, and they would ride the quads everywhere.
Q. Quads, what -- what are quads?
A. The four-wheelers.
Q. Those are motorized vehicles?
A. Right.
Q. Did you see them in the house?
A. Yes.
Q. Did you see them having meals together?
A. Yes, I did.
Q. Would you see this on a daily basis?
A. Pretty much.
Q. So over that period of time, did you notice whether or not he formed any special bonds with certain children?
MR. MESEREAU: Objection. Vague and foundation.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: These children who spent the night in Mr. Jackson's room, did they share any common characteristics?
MR. MESEREAU: Objection. Vague; foundation.
THE COURT: Overruled. 4673

You may answer.
THE WITNESS: Go ahead and ask me the question again.
Q. BY MR. AUCHINCLOSS: Okay. The question is, the children that spent the night in Mr. Jackson's room that you've talked about, did they share anything in common, any common characteristics?
MR. MESEREAU: Vague; foundation. Objection.
Q. BY MR. AUCHINCLOSS: Did they have anything in common?
Sorry.
THE COURT: All right. Objection sustained.
Q. BY MR. AUCHINCLOSS: Do you know if these children, whether or not -- did you notice the age of these children?
A. They were around 10, 11. Around that age.
Q. Did you notice what gender they were?
A. No, I don't.
Q. Did you notice whether they were boys or girls?
A. Well, yes, they were mostly boys.
Q. Did you ever see anyone else sleep in Mr. Jackson's room other than these children?
A. Pretty much it was just the boys. That's about it.
Q. You previously testified that there was alcohol on Neverland, true? 4674

A. That is correct.
Q. And I think you said you were somewhat responsible for stocking the alcohol at Neverland as house manager?
A. That is correct.
Q. Did Mr. Jackson drink?
A. Yes, he did.
Q. Are you aware of what his drinks of choice were, what he liked to drink, in terms of alcohol?
A. Well, he drink wine and vodka also.
Q. Okay. Where was the wine stored on the property?
A. Most of the wine, it was in the wine cellar. We also have wine in the house.
Q. Where in the house?
A. In the refrigerators.
Q. In the kitchen area?
A. Right.
Q. And the vodka, where was that kept?
A. In the kitchen.
Q. Okay. Was there any -- was it any secret at Neverland that Mr. Jackson drank alcoholic beverages?
MR. MESEREAU: Objection. Vague; calls for speculation; foundation.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Mr. Salas, were you ever told by anybody that Mr. Jackson's drinking was 4675

to be concealed from anybody?
MR. MESEREAU: Objection. Hearsay;
foundation.
THE COURT: Sustained.
MR. AUCHINCLOSS: On which basis, Your
Honor?
THE COURT: Hearsay.
Q. BY MR. AUCHINCLOSS: Did you see Mr. Jackson
drinking at Neverland?
A. I never saw him drinking.
Q. Have you ever seen him exhibiting the
effects of drinking?
A. Yes.
Q. On how many occasions?
A. Well, lately it was on a pretty much regular
basis.
Q. A regular basis?
A. Right.
Q. Did you ever see Mr. Jackson where he
appeared to have been drinking a great deal, that he
appeared to be drunk?
A. Yes.
Q. Did you ever see him appear to be drunk --
well, let me ask you this: Was there ever any
effort that you saw to conceal this fact that Mr.
Jackson had been drinking, that he was drunk, to
conceal that fact from his children?
MR. MESEREAU: Objection. Vague; leading; 4676

foundation.
THE COURT: Foundation; sustained.
Q. BY MR. AUCHINCLOSS: Mr. Salas, when you saw Mr. Jackson when he was drunk, did you ever see him in the presence -- in that condition, in the presence of his children?
A. Yes, I did.
Q. On more than one occasion?
A. Yes.
Q. Can you tell me how many or approximate?
A. Well, I couldn't tell you exactly how many times, but it was quite a few times.
Q. During that period of time -- and tell me -- let's get time specific here. What time frame are we talking about? Is this when you were house manager?
A. That is correct.
Q. During that period of time did you ever see Mr. Jackson make any effort to conceal his condition from his children?
MR. MESEREAU: Objection. Vague; foundation; calls for speculation.
THE COURT: I'm going to allow an answer to that question, but again, it's a foundational question.
So it can only be answered "yes" or "no."
I'll have the court reporter read it back to you.
We're asking do you have this knowledge. 4677

(Record read.)
THE WITNESS: Can you ask me the question a different way?
MR. AUCHINCLOSS: Sure.
Q. My question is, during the period of time when you saw Mr. Jackson when he was drunk in the presence of his children, did Mr. Jackson do anything to hide the fact that he had been drinking or that he was drunk when that occurred, when you saw that?
MR. MESEREAU: Same objection.
THE COURT: Overruled.
You may answer.
THE WITNESS: Not to my knowledge.
Q. BY MR. AUCHINCLOSS: You said that wine is stored in the wine cellar. Is there any hard liquor that's ever kept in the wine cellar?
A. Yes.
Q. What kind of hard liquor?
A. There's some whiskey, I believe. Some tequila. Pretty much that's it.
Q. And was there whiskey and tequila in the wine cellar during the time that the Arvizo children were there in 2003?
A. Yes.
Q. Did you ever see kids go into the wine cellar, any kids, during your period of time as house manager? 4678

A. Yes.
Q. And did you ever see the Arvizo kids go into the wine cellar?
A. I never saw them down in the wine cellar.
Q. Did you ever see them come out of the wine cellar?
A. No.
Q. Okay. Did you ever have any reports, as house manager, that the Arvizo children were in the wine cellar?
MR. MESEREAU: Objection; hearsay.
THE COURT: Overruled.
You may answer.
THE WITNESS: Not specifically the Arvizo kids.
Q. BY MR. AUCHINCLOSS: Okay. Have you ever served wine or any alcoholic beverage to Mr. Jackson when he was in the presence of children?
A. Yes, I did.
Q. On more than one occasion?
A. I would say that was a couple times.
Q. Do you remember any of the children that were with him when you served him alcoholic beverages, or wine, let's say?
A. I'm not exactly what kids were in there, but I know the Arvizos were there, the kids, and some other kids that were there as well.
Q. Okay. Now, tell me, was there a time when 4679

you brought him some wine and four glasses?
MR. MESEREAU: Objection; leading.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Okay. Tell me -- you said there was a couple of times that you brought Mr. Jackson wine in the presence of children. Tell me about the first one you remember. When was it?
A. It was at nighttime.
Q. Do you remember when it was in terms of the year that you served as house manager, approximately?
A. Well, it was -- I would say it was January somewhere. January, somewhere around there.
Q. Of 2002, 2003?
A. 2003.
Q. And about what time of night?
A. It was about -- I would say it was about nine o'clock.
Q. And where did you go, what room?
A. I went to Mr. Jackson's bedroom, upstairs.
Q. And what did you bring to Mr. Jackson's bedroom?
A. I brought some glasses, and some wine.
Q. What type of wine; do you remember?
A. I don't remember the type of wine.
Q. Do you remember whether it was red or white?
A. I want to say that it was a white wine.
Q. What type of glasses did you bring? 4680

A. Glass -- it was just glass wines.
Q. I'm sorry?
A. Glass wines.
Q. Wine glass?
A. No, let me back up. It was just glasses, normal glasses.
Q. Normal glasses?
A. Yes.
Q. Were they tall glasses or short glasses?
A. Short glasses.
Q. Can you describe them?
A. Short glasses.
Q. And who ordered this wine?
A. Mr. Jackson.
Q. Did you talk to him personally?
A. Yes.
Q. What did he tell you?
A. He called me and asked me to bring some glasses to his room and some wine.
Q. Did he tell you how many glasses?
A. Yes.
Q. How many?
A. Four of them.
Q. All right. So you brought the -- and did you do as he ordered you to do?
A. Yes, I did.
Q. And when you delivered this wine, did you deliver it to his bedroom? 4681

A. Yes, I did.
Q. Did you deliver it to the lower portion of his bedroom or the upstairs portion?
A. Just to the lower portion.
Q. Was Mr. Jackson or any of the children present when you delivered this wine?
A. Yes, there were.
Q. Who was present?
A. The kids that were there. Gavin, and I believe it was also Frank's brothers, the ones that were there. But let me tell you something else. He also ordered some sodas with that.
Q. Okay. So what do you mean, "some sodas"?
A. He also asked me to bring some sodas with that order.
Q. Tell me what you mean by "sodas."
A. Yes, just the normal soda cans.
Q. Soda drinks?
A. Yes.
Q. Now, you have previously talked to the sheriffs about this incident, haven't you?
A. Right. Right.
Q. And described for them that you brought a bottle of wine and glasses?
A. Uh-huh.
Q. Let me back up. Let me back up. So you brought some wine and glasses, and some sodas? 4682

A. Uh-huh.
Q. Let's move on to the second incident first, okay?
Tell me about the second incident. When did that occur?
A. That was -- it was also -- it was also nighttime.
Q. Nighttime?
A. Right.
Q. About what time?
A. That time it was about around eleven o'clock. Somewhere around 11:00.
Q. And was this before or after the incident that you just described?
A. That was after.
Q. And who placed the order on this occasion?
A. Mr. Jackson.
Q. And what did he order?
A. Some more wine.
Q. Okay. Did he also ask for glasses?
A. Yes.
Q. How many glasses?
A. This time I believe it was just one glass. It was just for him.
Q. Okay. And who was present when that -- when you delivered that wine?
A. I'm not exactly sure who was there, but I believe this time it was himself at night. 4683

Q. But I'm talking about -- you said there were two times that children were present when you served him. I'm talking about the second time that children were present.
A. Yeah, that time I'm not exactly who was there, how many of the kids were there.
Q. You're not sure?
A. No, I'm not sure.
Q. All right. Now, let's go back to this time -- this first incident where you said that you served wine and soda. You have been interviewed about this by the sheriff's department, right?
A. That is correct.
Q. And you were interviewed back in, I believe it was, 2003; is that right?
A. That's correct.
Q. And when you talked to the sheriff's department about this, you never mentioned anything about any soda?
A. No, I didn't.
Q. And why is that?
A. I don't know. It just -- it just flip out right now to my mind.
Q. You just remembered it just this second?
A. Right.
Q. And you said that you came back and the bottle of wine was empty?
A. That is correct. 4684

Q. Was there any other liquor you brought?
A. No, that was the second time --
Q. I'm talking about the first time.
A. No, that was it.
Q. And when you came back, was the bottle empty?
A. Yes, it was.
Q. Okay. The wine cellar. You said you didn't ever have any complaints of -- hear of any complaints regarding the Arvizos. Did you ever have any other complaints of any other children in the wine cellar?
A. Yes.
Q. And do you know which children they were?
A. When I was given those complaints, it was about the kids from Los Olivos.
MR. AUCHINCLOSS: Okay. If I could have the Elmo again, Your Honor, please.
Q. Showing you People's Exhibit 45. Is that one of the kids you're talking about?
A. Yes.
Q. 46?
A. Yes.
Q. That's one of the kids?
A. That's correct.
Q. And 47.
A. That is correct.
Q. Okay. Are there any other kids that you're 4685

referring to, or is that everybody that we're talking about?
A. No, I did get some other complaints about some other kids which wasn't these kids.
Q. Okay. Now, these three kids that -- I think you've identified them as being from Los Olivos previously, correct?
A. That's correct.
Q. We'll call them "the Los Olivos boys," okay?
A. Okay.
Q. Now, the Los Olivos boys, you said you had a complaint, complaints regarding them in the wine cellar. What was the nature of the complaint?
MR. MESEREAU: Objection; hearsay.
MR. AUCHINCLOSS: It's offered to explain conduct.
THE COURT: Whose conduct?
MR. AUCHINCLOSS: Mr. Salas's. And I can tell you at sidebar where I'm going, if you like.
THE COURT: The objection is sustained.
Q. BY MR. AUCHINCLOSS: Did you personally ever see the Los Olivos boys in the wine cellar?
A. Not in the wine cellar, but I saw them come out.
Q. You saw them coming out of the wine cellar. And when you saw them coming out of the wine cellar, what time of day are we talking about?
A. Early in the morning, around eight o'clock 4686

in the morning.
Q. And during that previous -- let's say the ten hours -- well, let's see, let me back up. Do you know if Mr. Jackson was in the wine cellar with them?
A. That early morning, or late night, early morning, Mr. Jackson was with the kids.
Q. And when you saw these kids come out of the within cellar, did you notice whether or not they exhibited any signs of being intoxicated?
MR. MESEREAU: Objection; leading.
THE COURT: Overruled.
You may answer.
THE WITNESS: Yes, I did.
Q. BY MR. AUCHINCLOSS: Tell me what you saw.
A. When I saw the boys coming out of the arcade, which is where the wine cellar is, the kids weren't acting normal. So I approached one of them, and I said, "Are you okay?" That's when I noticed that the kids were drunk.
Q. How drunk were they, if you could characterize it?
A. I would say that they were -- what would you call it? I mean, you can tell that they were drunk. I mean, I could see that they had been drinking.
Q. What were they doing that made you believe they'd been drinking?
A. The way they were acting. I mean, they 4687

1 weren't just normal. Something was wrong with the
2 kids.
3 Q. Did you notice any other times when these
4 three boys had been drinking, and it was apparent to
5 you that they had been drinking?
6 MR. MESEREAU: Objection. Leading;
7 relevance; foundation.
8 THE COURT: Overruled.
9 You have may answer.
10 THE WITNESS: Your question was what date?
11 Q. BY MR. AUCHINCLOSS: No, my question --
12 you've told us about one incident where you noticed
13 the three Los Olivos boys had been drinking. I want
14 to know if you ever observed a second time that
15 these same boys had been drinking.
16 A. Yes, there was a second time.
17 Q. And when was that?
18 A. I want to say it was -- it was after that
19 one. Not exactly sure, you know, how many weeks
20 after that. But I would say it was two, three weeks
21 after that one.
22 Q. And when was the first time, approximately?
23 A. I want to say it was in October when I saw
24 those kids the first time.
25 Q. 2002? 2003? You tell me.
26 A. It was 2002, I believe.
27 Q. Okay. And where did you see these boys the
28 second time when they appeared to have been 4688

drinking?
A. At the house.
Q. Inside the house?
A. Yes. Well, they were everywhere, but, yes,
they were in the house.
Q. Was Mr. Jackson on the property at that
time?
A. Yes, he was.
Q. Had these boys been spending any time with
Mr. Jackson that day?
MR. MESEREAU: Objection; foundation.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Had you observed
whether or not Mr. Jackson had spent any time with
these boys earlier that day?
A. I don't believe that day he spent time with
them. They were alone.
Q. Okay. Did you see the boys all -- during
the entire time they were on the property?
A. Yes.
Q. You were with them the entire time?
A. No.
Q. So do you know whether or not they spent
time with Mr. Jackson for certain?
MR. MESEREAU: Objection. Leading;
foundation.
THE COURT: Argumentative; sustained.
Q. BY MR. AUCHINCLOSS: Okay. So what portion 4689

of that day did you spend actually observing the boys? Let me back up. Let me back up. How long were these boys on the property that particular day?
A. They were there till twelve o'clock, one o'clock.
Q. At night?
A. Uh-huh.
Q. Or one o'clock in the morning, I guess?
A. One o'clock in the morning, yes.
Q. And when did they arrive?
A. They arrived around noontime.
Q. And how much of that time -- so that's about 12 hours, right?
A. Right.
Q. How many of those hours were they in a place that you could see them, where you were actually seeing them?
A. Well, they were back and forth, and they were everywhere, so I really didn't have a control of watching them or any of that stuff.
Q. Okay.
A. But they were back and forth in the house, back at the park, different places.
Q. Do you know where they got their alcohol?
A. No, I don't.
Q. Were you responsible for cleaning the wine cellar?
A. Yes. 4690

Q. Did you observe any other incidents where Mr. Jackson was in the wine cellar with children? I mean, did that happen on other occasions? And I'm confining this just to the time you were house manager.
A. No, I don't.
Q. Do you know? You don't recall any other times?
A. Not that I can remember.
Q. Okay. Now, during the time that you were house manager, did you ever observe any adult magazines in Mr. Jackson's private quarters?
A. Yes, I did.
Q. Did these magazines feature nudity?
A. Yes.
Q. And where were these -- which room were these magazines in?
A. They were on the first floor on the left side in one of the bathrooms.
Q. Were those magazines there in that bathroom during the time that the Arvizos were at Neverland?
A. Yes.
MR. AUCHINCLOSS: Madam Clerk, may I double-check with you? I have three items I'm marking. I want to double-check and make sure these numbers haven't been used. 777, 778, and 779.
THE CLERK: No, they haven't.
MR. AUCHINCLOSS: All right. Thank you. 4691

May I approach, Your Honor?
THE COURT: Yes.
Q. Mr. Salas, I show you People's Exhibit 777.
Can you identify that for me, please?
A. Yes. These are some statues that were in
Mr. Jackson's office.
Q. I show you People's Exhibit 778. Would you
please identify that for me?
A. Yes, they were also in his office.
Q. And People's Exhibit 779?
A. Yes. That is correct. They were in his
office.
Q. Okay. Thank you. Can you tell me where
these statues were located?
A. They were located in Mr. Jackson's office.
They were placed on different stands.
Q. Were they on display?
A. Yes.
Q. Over what period of time are we talking
about?
A. Well, they have been there a long time.
Q. Were they there the entire time you were
house manager?
A. Yes.
Q. Were they there during the time that the
Arvizos were present on the property?
A. Yes.
Q. Were they there -- did Mr. Jackson's 4692

1 children ever visit that office?
2 A. Yes.
3 MR. AUCHINCLOSS: Your Honor, I'd like to
4 offer into evidence People's Exhibit 777, 778 and
5 779 at this time.
6 MR. MESEREAU: No objection.
7 THE COURT: It's admitted. All three.
8 MR. AUCHINCLOSS: All right. If I may
9 publish these, Your Honor.
10 THE COURT: All right.
11 Q. BY MR. AUCHINCLOSS: All right. Showing you
12 People's Exhibit 777, is that an accurate depiction
13 of one of the dolls that you saw in Mr. Jackson's
14 office?
15 A. That is correct.
16 Q. Or statues. Whatever they are.
17 778, there are two photographs there. Do
18 those photographs accurately depict the dolls that
19 were present during the period of time that you were
20 house manager in Mr. Jackson's office?
21 A. Yes.
22 Q. And 779; same questions. Were those -- are
23 those accurate depictions of what you observed in
24 Mr. Jackson's office during the time that you were
25 house manager?
26 A. That is correct.
27 Q. All right. Going back to the period of time
28 when the Arvizos were on the property, was there -- 4693

and I want to talk about the first visit, the first visit in 2003, after you picked up the Arvizos from the airport.
You previously testified that they were at Neverland for a period of approximately two weeks.
Mr. Salas, during that period of time did you observe the Arvizo family to be restricted in any way?
A. That is correct.
Q. In what way were they restricted?
A. I believe they weren't allowed to leave Neverland Valley Ranch.
Q. And why do you say that?
A. Because I had a talk to the mother and she's the one that told me.
MR. MESEREAU: Objection, that's hearsay.
Move to strike.
MR. AUCHINCLOSS: Goes to state of mind.
Also offered to explain this witness's conduct later.
THE COURT: I will admit it for the limited purpose of explaining the conduct of Jesus. It's not to be used for the truth of the matter asserted by Janet.
MR. AUCHINCLOSS: All right.
Q. So at some point, did you personally help the Arvizo family to get out of Neverland?
A. Yes, I did. 4694

Q. How did you do that?
A. I took them down to L.A.
Q. You drove them personally?
A. Yes, I did.
Q. Did you take -- use -- I take it you used one of Mr. Jackson's cars?
A. That is correct. I got a phone call from her, and she wanted to talk to me about something.
MR. MESEREAU: Objection; hearsay.
MR. AUCHINCLOSS: It's offered for the same purpose.
THE COURT: It's nonresponsive. Sustained.
MR. AUCHINCLOSS: Okay.
Q. So tell me what precipitated your conduct of helping the Arvizos by taking them off the property. What happened? What was it that made you do that?
A. Like I said, she called me at my office and wanted to talk to me. So I came over, and I thought it was something that I needed to take care of, you know, in the room. And she asked me to --
MR. MESEREAU: Objection, hearsay, Your Honor.
THE COURT: I'll admit it for the limited purpose again to explain what he's doing, not for the truth of the matter that she asserted.
THE WITNESS: So she asked me -- she told me if I can drive them down to L.A., that she wanted to leave the property. 4695

So I ask her, you know, “What’s the reason? Why do you want to leave the property?” She was very --
MR. MESEREAU: Same objection.
THE COURT: Sustained after he started on another subject.
MR. AUCHINCLOSS: Okay.
Q. Can you tell me what her emotional state was at the time?
A. She was very upset.
Q. How was she demonstrating that she was upset?
A. Crying.
Q. What time of -- what time of the day or evening are we talking about here when this happened?
A. We’re talking about nighttime.
Q. Nighttime?
A. Yes.
Q. Did she express any -- did she express any fear while you were talking to her?
MR. MESEREAU: Objection; leading.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: When you were talking to her, did she appear to be fearful of something?
MR. MESEREAU: Objection; leading.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Tell me about any other 4696

1 emotional -- expressions of emotion that she had, if
2 you noticed any.
3 A. Well, she looks very preoccupied. She was
4 just -- she wasn't comfortable there. She just
5 wanted to leave the property.
6 THE COURT: All right. Let's take our break.
7 (Recess taken.)
8 --o0o--
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REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE)
OF CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify:

That the foregoing pages 4649 through 4697 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on April 4, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California, April 4, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

MONDAY, APRIL 4, 2005

8:30 A.M.

(PAGES 4699 THROUGH 4898)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 4699

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1 I N D E X
2
3 Note: Mr. Sneddon is listed as “SN” on index.
4 Mr. Zonen is listed as “Z” on index. Mr. Auchincloss is listed as “A” on index.
5 Mr. Nicola is listed as “N” on index. Mr. Mesereau is listed as “M” on index.
6 Ms. Yu is listed as “Y” on index. Mr. Sanger is listed as “SA” on index.
7 Mr. Oxman is listed as “O” on index.
8
9 PLAINTIFF’S
10 WITNESSES DIRECT CROSS REDIRECT RECROSS
11 SALAS, Jesus 4711-M 4781-A 4800-M
12 FRANCIA, Jason 4806-Z 4846-M
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THE COURT: Go ahead, Counsel.
MR. AUCHINCLOSS: Thank you, Your Honor.
Q. Before I continue where I left off with the Arvizos, Mr. Salas, I wanted to ask you a couple of questions about -- one involving the wine cellar.
At some time during your occupation as the house manager, was there a safe that was put in to keep some of the keys to various places, including the wine cellar?
A. Yes, there was.
Q. And where was that safe put in?
A. It was in the -- inside the house in what we call the maids' room.
Q. When was that safe put in?
A. It was during the time that we noticed the kids were having access to alcohol.
Q. The Los Olivos boys?
A. That is correct.
Q. And can you help me out with the time frame in terms of what we're -- 2002 or 2003?
A. 2003.
Q. 2003?
A. Yes.
Q. You said that it was October of 2002 when the problem occurred with the Los Olivos boys.
A. Yes, but we didn't took action until after that. It took us a while to put the key away.
Q. Have you previously told detectives that it 4702

1 was in the -- it was around December of 2002 that
2 the safe was put in?
3 A. I must have said that. I mean, I could be
4 wrong.
5 Q. Do you have a clear recollection of exactly
6 when the safe went in?
7 A. I don't know.
8 Q. Do you recall that the safe was there when
9 the Arvizos were there?
10 A. Yes, it was in, the safe.
11 Q. All right. And the wine cellar key, was it
12 kept in that safe?
13 A. That is correct.
14 Q. All right. So when you took the Arvizos
15 from Neverland, what car did you use?
16 A. I used the Rolls Royce.
17 Q. And who was it that decided to use that
18 particular car? Whose decision was that?
19 A. It was my decision.
20 Q. Had you previously done some driving for
21 Mr. Jackson? I know you previously testified you
22 did the limo drive to Neverland. But other than
23 that, had you previously done some driving for
24 Mr. Jackson?
25 A. Yes, I did.
26 Q. And did you previously use that car on
27 occasion?
28 A. Yes. 4703

Q. Did you tell anybody that you were taking the Jacksons -- or did you tell anybody that you were taking the Arvizos off property?
A. Yes, I did.
Q. Who did you tell?
A. I told Mr. Jackson's bodyguard, Chris Carter.
Q. And why did you tell Chris?
A. Because it was not my decision to make to take the family off the property without telling somebody.
Q. Okay. Was Dieter on the property at the time?
A. Yes, he was.
Q. Was Ronald on the property at the time?
A. No, he wasn't.
Q. Was Frank on the property at the time?
A. Yes, he was.
Q. Was there a reason you didn't tell Dieter or Frank that you were taking them off the property?
A. It was late, and the reason I didn't told them, it was because I didn't know who to tell, so I told Chris about the situation.
Q. Okay.
A. And so --
Q. Did Miss Arvizo express to you, during that period of time, that she was fearful of anything?
MR. MESEREAU: Objection; leading. 4704

THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Did Miss Arvizo express
concern to you over any particular individuals at
Neverland?
MR. MESEREAU: Objection; leading.
THE COURT: Overruled.
THE WITNESS: Yes, she did.
Q. BY MR. AUCHINCLOSS: Who was she concerned
about?
A. It was Dieter and Ronald.
Q. Was she concerned about Frank at all?
A. She didn't really say too much about Frank.
Q. So you drive her off the property. Where
did you take her and her children?
A. Down south, L.A.
Q. Did you take her to a residence?
A. Yes.
Q. Was it a house or an apartment?
A. It was a house.
Q. And was it the place -- did she direct you
to the location where she wanted to go?
A. Yes.
Q. Did you get in any trouble for taking the
Arvizos off the property?
A. Yes, I did.
Q. Tell me about that.
A. Well, the next day, I was told that they
weren't supposed to leave the property. 4705

MR. MESEREAU: Objection; hearsay.
MR. AUCHINCLOSS: I can ask a couple of other questions that will tighten it up, Your Honor.
THE COURT: All right. I'll strike the answer.
MR. AUCHINCLOSS: And this answer will be offered in furtherance.
Q. Who told you you were in trouble?
A. The first person that told me, it was Frank.
Q. Frank Tyson?
A. Uh-huh.
Q. And what did Frank tell you?
A. He told me not -- that they weren't supposed to leave the property. They were supposed to be notified first.
Q. Who was supposed to be notified first?
A. Him.
Q. Did he tell you how to handle yourself in the future?
A. Yes, he did.
MR. MESEREAU: Objection; leading.
MR. AUCHINCLOSS: I'll rephrase.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Did he make any remarks to you concerning the future?
A. Yes, he did.
Q. What did he say?
A. Not to make -- I mean, if it was a second 4706

time, not to do that anymore.
Q. Not to let the Arvizos off the property if they come back?
MR. MESEREAU: Objection; leading.
THE COURT: Sustained.
MR. MESEREAU: Move to strike.
THE COURT: Stricken.
Q. BY MR. AUCHINCLOSS: Did anybody else tell you that you did the wrong thing?
A. Yes.
Q. Who was that?
A. Dieter.
Q. What did Dieter tell you?
A. Same thing.
MR. MESEREAU: Objection; hearsay.
MR. AUCHINCLOSS: Same purpose.
THE COURT: Overruled. It's admitted for the limited purpose under the conspiracy instruction that I talked to you about earlier. Go ahead.
Q. BY MR. AUCHINCLOSS: Tell us what Dieter told you.
A. He told me the same thing; that next time I should tell them about the situation first.
Q. Did the Arvizos -- well, let me back up. When Miss Arvizo was talking to you about her desire to leave the ranch, did you speak English with her?
A. Yes, I did.
Q. Did you ever speak with her in a different 4707

language?
A. No.
Q. Okay. Are you fluent in Spanish?
A. Yes, I am.
Q. Do you know if she is?
A. No, I don't.
Q. Around -- well, let's talk about when they returned to the property. You said a short time after the first -- they first left Neverland, the Arvizos returned.
A. That's correct.
Q. Were you there when that happened?
A. Yes.
Q. And when they returned to the property, did Mrs. Arvizo ever ask you to transport her off the property on that occasion, on the second visit?
A. Yes, she --
MR. MESEREAU: Objection. Leading; hearsay.
MR. AUCHINCLOSS: Also offered to explain conduct.
THE COURT: The objection is overruled. And I'll admit it for the limited purpose of explaining his behavior. Go ahead.
Q. BY MR. AUCHINCLOSS: What was your answer?
A. Yes. Yes, I was.
Q. And when did she make that request of you, in relationship to the time that she arrived?
A. I would say it was -- it was about a week 4708

1 when she asked me again.
2 Q. And did you take her off the property that
3 time?
4 A. No, I didn't.
5 Q. Why not?
6 A. Because I was told not to do that anymore.
7 Q. Now, at some point the Arvizos left
8 Neverland --
9 A. Yes, they did.
10 Q. -- for the final time.
11 Have you ever seen them since that time?
12 A. That was the last time I saw them.
13 Q. Do you recall when you were first
14 interviewed about the general facts that you've just
15 described for us by law enforcement?
16 A. Yes.
17 Q. And was there anything special about that
18 particular day when you first spoke to law
19 enforcement?
20 MR. MESEREAU: Objection. Vague; leading.
21 THE COURT: Overruled.
22 You may answer.
23 THE WITNESS: When you said about special,
24 what do you mean?
25 Q. BY MR. AUCHINCLOSS: Was there anything
26 unusual that happened on that date --
27 A. Yes.
28 Q. -- that you're aware of? 4709

A. Yes, it was.
Q. What was it?
A. That was when the police came over to Mr. Jackson's house.
Q. The day of the search warrant?
A. The day of the search, yes.
Q. Do you remember what month that was?
A. It was November.
Q. Okay. So you told the police about this, helping the Arvizos, on the same day as the search warrant was issued, or executed, I should say; is that accurate?
A. That is correct.
MR. AUCHINCLOSS: Thank you, Mr. Salas. I have no further questions.
THE COURT: Okay. Cross-examine?
MR. MESEREAU: Yes, please, Your Honor.

CROSS-EXAMINATION
BY MR. MESEREAU:
Q. Good morning.
A. Good morning.
Q. Is it Mr. Salas or Salazar?
A. Salas.
Q. Salas, okay. My name is Tom Mesereau and I speak for Michael Jackson, okay?
We haven't spoken before, right?
A. I believe we have. Didn't you call me one 4710

time or something like that?
Q. I didn't. That was an investigator.
A. It wasn't you.
Q. Okay. You spoke to one of our investigators named Jesus Castillo, correct?
A. That is correct.
Q. And you spoke to him around January 9th, 2005, right?
A. Must have been, yes.
Q. Okay. Okay. And do you know -- where did that interview take place; do you know?
A. Yes. Was it the Holiday Inn, Santa Maria?
Q. Okay. And approximately how long do you remember speaking with our investigator, Jesus Castillo?
A. It took, I would say, about half an hour.
Q. Okay. And do you remember you told Mr. Castillo that when you told the police that you remembered Gavin and Star sleeping in Mr. Jackson's room, you meant the lower portion of the two-level suite, correct?
A. That is correct.
Q. You told Mr. Castillo that Mr. Jackson's room has an upstairs portion and a downstairs, correct?
A. That is correct.
Q. And you told him that you never saw Gavin or Star sleeping in Mr. Jackson's bed located upstairs, 4711

right?
MR. AUCHINCLOSS: I'll object; foundation.
THE COURT: Overruled.
You may answer.
THE WITNESS: That is correct. I never saw
them sleeping in the bed. I saw them out of bed,
not sleeping.
Q. BY MR. MESEREAU: Right. The only place you
ever saw Gavin or Star sleeping was in the
downstairs portion of Mr. Jackson's room, right?
MR. AUCHINCLOSS: Objection; foundation.
THE COURT: Overruled.
You may answer.
THE WITNESS: That is correct.
Q. BY MR. MESEREAU: Okay. And you remember
many guests of Mr. Jackson sleeping in his room,
sometimes upstairs and sometimes downstairs, right?
A. That is correct, if you're talking about the
boys, yes.
Q. Yeah. He had guests come and sleep from
time to time --
A. That is correct.
Q. -- in that suite, correct?
A. That is correct.
Q. Sometimes you'd see them upstairs, sometimes
you'd see them downstairs, right?
A. That is correct.
Q. Okay. Now, one time you suspected that 4712

Gavin might have been drinking at a dinner table, right?
A. That is correct.
Q. But you never saw Gavin drinking, right?
A. That is correct.
Q. And his family used to have dinner at the dinner table, right?
A. That is correct.
Q. His mother used to have dinner at the dinner table, correct?
A. Yes.
Q. Now, the prosecutor asked you questions about whether or not children have a lot of freedom at Neverland, right?
A. Right.
Q. And your answer was basically they do, right?
A. That is correct.
Q. And so do their parents have freedom at Neverland, correct?
A. That is correct.
Q. The prosecutor asked you about something along the lines of first-class service. Do you remember that?
A. Yes.
Q. And you said that Mr. Jackson liked to have his guests get high-quality service, right?
A. That is correct. 4713

Q. But when you said that, you were also including adult guests, correct?
A. Right.
Q. And when you were there and you saw Janet Arvizo there, she was getting first-class service, true?
A. Yes, she was.
Q. Do you remember a period of time when Janet Arvizo was there with her former husband, David Arvizo? Do you remember that?
A. One time, yes.
Q. And they both were entitled to first-class service, correct?
A. That is correct.
Q. And when Janet came with just her children, she had all the privileges that guests get at Neverland, right?
A. That is correct.
Q. She was able to enter the main residence, right?
A. Yes.
Q. She was able to order food when she wanted, correct?
A. Yes.
Q. She could sit at the dinner table at the main house and have dinner, or lunch, or breakfast, right?
A. That is correct. 4714

Q. She also was allowed to enter the kitchen and sit at that bar area and order breakfast when she chose, right?
A. That is correct.
Q. She also ordered room service when she wanted, right?
A. That is correct.
Q. And do you know which quarters she stayed in?
A. If I remember, it was on Unit 4.
Q. And that's one of the most beautiful rooms on that property, isn't it?
A. Yes, it is.
Q. It's a room where Elizabeth Taylor and Marlon Brando request to stay, or used to request to stay from time to time, correct?
MR. AUCHINCLOSS: Objection; relevancy.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Janet was entitled to the same service that guests like Elizabeth Taylor and Marlon Brando would get, correct?
MR. AUCHINCLOSS: Objection; relevancy.
THE COURT: Overruled.
Q. BY MR. MESEREAU: Right?
A. That is correct.
Q. And when you told the jury that the theater would be open day and night, adult guests also were allowed to go into the theater day or night, right? 4715

A. That is correct.
Q. And when you told the prosecutor that there was some rooms in the theater with beds in them, adults could use those rooms, true?
A. That is correct.
Q. The prosecutor talked about candy and sodas and food being available at all hours of date. They were also available for adult guests, correct?
A. That is correct.
Q. And isn't it true that Mr. Jackson wanted his adult guests to have special, classy service, right?
A. That is correct.
Q. Now, you saw kids at Neverland visiting when Mr. Jackson wasn't there, correct?
A. That is correct.
Q. And typically, if kids visited Neverland when Mr. Jackson wasn't there, there were rules that were supposed to be followed for safety, as you said, right?
A. That is correct.
Q. And typically, it was their parents or whatever adults were with them that appeared to be in charge of them, correct?
A. That is correct.
Q. And you saw busloads of children from various locations visit Neverland from time to time, correct? 4716

A. That is correct.
Q. And to your knowledge, Mr. Jackson wasn't in charge of all of those busloads of children, was he?
A. No, he wasn't.
Q. In fact, most of the time when lots of kids would visit Neverland, some other adult appeared to be in charge of those kids, right?
A. That is correct.
Q. And adults and children would visit Neverland and be given tours of Neverland, right?
A. That is correct.
Q. Who typically would give those tours?
A. We assigned different people, employees of Neverland Valley.
Q. And tell the jury how a tour would be conducted when children and adults would visit Neverland.
A. They were --
MR. AUCHINCLOSS: Objection. Relevancy; beyond the scope.
THE COURT: Overruled.
Go ahead.
THE WITNESS: They would arrive at Neverland Valley Ranch, park on the outside parking lot, walk to the train station. And from there, they were picked up either by train or walk, whatever they preferred to do, okay, take them back to the theater. Enjoy, you know, the petting zoo. They 4717

were allowed to visit where they wanted to. I mean, we had a schedule for them and took them everywhere, the property, to show them the place and enjoy the place. And they ended up at the theater and at the park.
Q. BY MR. MESEREAU: And you would schedule lots of tours from time to time, right?
A. That is correct.
Q. Sometimes you'd have a couple of hundred children visiting with adults, correct?
A. That is correct. Sometimes more than that.
Q. What's the largest number of kids you remember visiting at one time to Neverland?
A. I would say about 300, 300 kids.
Q. And did they come with adults who were in charge of them?
A. Yes.
Q. Okay. And did you arrange tours for these children as well?
A. Yes. We assigned the personnel to give them a tour, yes.
Q. Okay. And sometimes, if Michael Jackson was on the premises, he would come out and say hello, right?
A. That is correct.
Q. But he never was in charge of what these kids did, right?
A. That is correct. 4718

MR. AUCHINCLOSS: Objection; vague as to "kids."
THE COURT: Overruled. The answer's in.
Next question.
Q. BY MR. MESEREAU: Who would prepare the schedule to indicate whether children were coming to Neverland on a particular day?
A. I believe that came from L.A. office.
Q. And would it be posted somewhere?
A. Yes. All Neverland personnel got a schedule of the kids coming to Neverland.
Q. And would you get a schedule typically the day before or that morning?
A. Normally we got it, like, two days before, a day before, yes.
Q. And as part of your work, you had to look at the future schedule every day, didn't you?
A. That is correct.
Q. Because almost every day something unusual or special would be going on at Neverland, right?
A. That is correct.
Q. And how long did you work at Neverland?
A. The total was 20 years.
Q. During that 20-year period, would it be accurate to say that many, many thousands of children came through, right?
A. That is correct.
Q. They came from Los Angeles, right? 4719

A. That is correct.
Q. They came from Santa Barbara, right?
A. Right.
Q. They came from foreign countries, right?
A. That is correct, yes.
Q. Based upon your experience over 20 years, Neverland was a real attraction for children around the world, wasn't it?
A. Yes, it was.
Q. And you considered a major part of your responsibility to be making sure that Neverland was kept up properly so that when children from all over the world came, they'd have a good time, right?
A. That is correct.
Q. Over 20 years, it may have been hundreds of thousands of children you saw visit, right?
A. That is correct.
Q. Now, the prosecutor asked you about the time Janet Arvizo asked you to drive her to Los Angeles, okay?
A. Correct.
Q. You told Jesus Castillo, our investigator, that at no time did anyone forcibly keep her at Neverland Ranch, right?
A. That is correct.
Q. And at no time was she ever locked in her room, right?
A. Not that I was aware of. 4720

Q. And at no time was she kept at Neverland Ranch against her will, right?
A. That is exactly what I said, yes.
Q. She called you upset and asked you to take her home and you did so, right?
A. Yes.
Q. You took her, yourself, in December; is that correct? Do you remember what month you took her yourself in the Rolls Royce?
A. It was December or January, somewhere around there. Pretty bad on dates.
Q. And then she came back, what, in less than a week?
A. I would say in about a couple weeks, thereabout.
Q. She came back, and then, a few weeks later, wanted to leave again, right?
A. That is correct.
Q. And you arranged transportation for her to leave again, right?
A. Yes, I had to call a limo.
Q. And that was, as far as you know, the last time you ever saw the Arvizos, correct?
A. Correct.
Q. When you drove Ms. Arvizo and her children in the Rolls Royce, she never made any complaints about the way she'd been treated at Neverland, right? 4721

A. That is correct.
Q. She never said she'd been abused at
Neverland, right?
A. That is correct.
Q. She never said her children had been taken
advantage of at Neverland, right?
A. That is correct.
Q. But she didn't seem to like Dieter or
Ronald, right?
A. That is correct, yes.
Q. And she told you she was concerned about
media attention on her family, right?
A. She mentioned about that, yes.
Q. Her concerns to you were media attention and
the fact that she didn't like Dieter, right?
A. That is correct, yes.
Q. She never complained about anything else,
did she?
A. No.
Q. In fact, she told you she respected and
liked Michael Jackson, right?
A. Yes, she did.
Q. She never complained to you about Michael
Jackson at all, did she?
A. Never.
Q. When you drove her in the Rolls Royce, she
was in the front seat with you, right?
A. Yes. 4722

Q. Her children were in the back seat, right?
A. That is correct.
Q. And you and she spoke during that three-hour trip, right?
A. She didn't spoke too much, but, yes, she did.
Q. Did you speak to her very much when she used to stay at Neverland?
A. No.
Q. Okay. And in -- on that trip, excuse me, Janet Arvizo never complained that she was being taken out of the country against her will, did she?
A. No, she never said anything.
Q. Do you remember when she returned, you think, within the next couple of weeks?
A. It was in the next couple of weeks, yes.
Q. Do you remember seeing her suddenly show up with her children again?
A. Yes.
Q. And do you know what time of day that was?
A. I believe it was afternoon.
Q. Did you talk to her when you saw her return?
A. Yes, I did.
Q. You never got the impression she was there against her will at that point, did you?
A. No, I didn't.
Q. The last time Janet and the kids left Neverland, do you know who drove them home? 4723

A. Yes, I called a limousine service.
Q. So you took her in a Rolls Royce one time, and the last time it was a limousine service that you arranged, true?
A. That is correct.
Q. Do you remember any other times that Janet and the children left Neverland?
A. That was the last time I saw them.
Q. So you're only personally aware of two times where they left Neverland; is that right?
A. Yes.
Q. That you had anything to do with?
A. That is correct.
Q. Okay. Now, the prosecutor asked you about a safe that was brought onto the property to lock keys. Do you remember that?
A. Uh-huh.
Q. And if you remember, whose idea was it to put a safe where the keys could be locked?
A. It was the ranch manager idea and my idea.
Q. Did you discuss it with Michael Jackson?
A. No, we never did.
Q. You just ordered a safe?
A. We just ordered a safe.
Q. And you put the keys in the safe?
A. That is correct.
Q. And before that, where were the keys kept?
A. They were kept in the same room, behind 4724

1 the -- behind the door to the entry to the room,
2 yes.
3 Q. Is that the entrance to the wine cellar?
4 A. No, no, no. That's the entrance to the
5 maids' room.
6 Q. Okay. Okay. But they were hung out in open
7 view, right?
8 A. That is correct, yes.
9 Q. Do you remember Frank Tyson's sister, Marie
10 Nicole?
11 A. Yes.
12 Q. Do you remember her staying at Neverland?
13 A. Yes.
14 Q. Do you remember her walking around the
15 property and playing with Michael Jackson?
16 A. Yes, I do.
17 Q. Was it your impression that the family was
18 close to Michael Jackson?
19 A. Yes.
20 Q. Did you see Frank Tyson's parents visit from
21 time to time?
22 A. That is correct, yes.
23 Q. And do you remember their names?
24 A. I don't. Sorry.
25 Q. Did you see Frank Tyson's brothers visit
26 from time to time?
27 A. Yes.
28 Q. Okay. You talked about a combination to Mr. 4725

1 Jackson's room. Remember that?
2 A. Yes.
3 Q. And did you always have that combination?
4 A. Yes, I did.
5 Q. Do you know if anyone else had it, to your
6 knowledge?
7 A. Ranch manager.
8 Q. What about staff who cleaned the room? Did
9 they typically have it?
10 A. Yes. Yes. We have -- we had another guy
11 there that also had it, know the combination of the
12 room.
13 Q. And that combination was changed
14 periodically, right?
15 A. My time there, we changed it about a couple
16 times.
17 Q. Okay. Do you remember it being changed
18 because too many people seemed to have it?
19 A. We noticed there was so many kids going into
20 the room, so we figured we change the combination,
21 yes.
22 Q. Do you remember Michael Jackson complaining
23 that Frank was going into his bedroom when Michael
24 was out of town?
25 MR. AUCHINCLOSS: Objection; hearsay.
26 THE COURT: Sustained.
27 Q. BY MR. MESEREAU: Was it your understanding
28 that Frank could get into that room on occasion? 4726

MR. AUCHINCLOSS: Objection; foundation.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you know whether or not Frank seemed like he could get into Michael's bedroom from time to time?
MR. AUCHINCLOSS: Objection; foundation.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Did you ever observe Frank in Michael Jackson's bedroom?
A. Yes.
Q. Did you ever see Marie Nicole in Michael Jackson's bedroom?
A. Yes.
Q. And again, when I say "bedroom," we're talking about two levels, right?
A. That is correct.
Q. It's a rather large area, isn't it?
A. That is correct, yes.
Q. And on the lower level, people can sit down and enjoy themselves, can't they?
A. That is correct. Yes.
Q. What do you recall there being on the lower level of Michael Jackson's bedroom when you were working there?
A. I just recall that it was a peaceful area that people can sit and enjoy themselves there. Fireplace or -- it was pretty peaceful place to be.
Q. And he would entertain people in the lower 4727

1 portion of his bedroom, correct?
2 A. That is correct, yes.
3 Q. People would get served food there, correct?
4 A. That is correct, yes.
5 Q. People would get served drinks there, right?
6 A. That is correct.
7 Q. And you say there's a fireplace?
8 A. There's a fireplace there.
9 Q. People would sit around the fireplace and
10 chat, correct?
11 A. Yes.
12 Q. And sometimes they did it when Mr. Jackson
13 was there, and sometimes they did it when he wasn't
14 there, right?
15 MR. AUCHINCLOSS: Objection. Foundation;
16 assumes facts.
17 THE COURT: Overruled.
18 You may answer. Do you want the question
19 read back?
20 MR. MESEREAU: Do you want -- I'm sorry.
21 THE WITNESS: Answer it?
22 THE COURT: Yes. Do you want the question
23 read back?
24 THE WITNESS: No, I understood the question.
25 Pretty much when Mr. Jackson wasn't there,
26 nobody was allowed to go into his room.
27 Q. BY MR. MESEREAU: There were times when he
28 let people in, weren't there? 4728

A. Yes, there was.
Q. And they would have some fun when Mr.
Jackson wasn't even there, right?
A. That is correct, yes.
Q. Okay. Now, approximately what year did you
start working at Neverland?
A. Since the beginning, do you mean?
Q. Yes.
A. I would say in '83, 1983.
Q. '83?
A. Uh-huh.
Q. So, there was a point in time where your
daughter used to visit Neverland, right?
A. That is correct.
Q. And what is her name?
A. Sandra.
Q. Sandra used to visit when she was
approximately five years old, right?
A. Five, six, yes.
Q. She used to play with Michael Jackson,
right?
A. Yes, that is correct.
Q. He used to give her gifts, right?
A. That is correct, yes.
Q. Now, normally do people who work at
Neverland bring their children there very often?
A. We have -- they have what is called "Family
Day," yes. 4729

Q. And please tell the jury what "Family Day" is.
A. Family Day is a day where it's open for the employees to bring all your family and have access to all the facilities there, yes.
Q. And how often does that happen?
A. Once a year at least.
Q. And that's a big event at Neverland, right?
A. That is correct, yes.
Q. And Michael Jackson closes Neverland off for other visits and lets all of the help and their family take over pretty much, right?
A. Yes, sir.
Q. And it starts in the morning, doesn't it?
A. Yes.
Q. Goes late into the evening, right?
A. Yes.
Q. Now, you mentioned a petting zoo before. Please tell the jury what the petting zoo is.
A. The petting zoo is a place where they have just little animals for kids, where they can go and play with the animals. We have -- I mean, they have a variety of animals where kids can, pretty safe, go and touch the animals.
Q. And what kind of animals do you have in the petting zoo?
A. Well, they have llamas. They have deers. They are rabbits. They have pigs. Birds. What 4730

1 else do they have? They have lots of animals.
2 Q. And the petting zoo is primarily designed
3 for kids, correct?
4 A. That is correct, yes.
5 Q. And then you have a larger zoo, right?
6 A. That is correct.
7 Q. And please tell the jury what's in the
8 larger zoo.
9 A. Well, that's where you can find the big
10 animals. Like you can find elephants, lions,
11 chimpanzees. You can find llamas and different
12 other animals. Wolfs. Stuff like that.
13 Q. You got giraffes, right?
14 A. Giraffes.
15 Q. There's a camel?
16 A. Right, exactly.
17 Q. And typically, at least once a day, the
18 trainers walk two elephants through the property,
19 right?
20 A. That is correct, yes.
21 Q. And they walk the elephants through the
22 property, and very often guests, if they follow the
23 rules, can feed them, right?
24 A. That is correct, yes.
25 Q. And Mr. Jackson will pay for bags of
26 doughnuts and goodies to give to the elephants,
27 right?
28 A. That is correct, yes. 4731

Q. Is that a once-a-day affair?
A. Yes, pretty much once a day.
Q. Okay. It's usually a big thing for kids and their parents, right?
A. Right.
Q. Now, as part of your duties at Neverland, you often would pay for toys for kids, correct?
A. That is correct. Yes.
Q. And you would be reimbursed, typically, if you spent your own money on toys, right?
A. That is correct, yes.
Q. You would get a reimbursement check of -- for as much as $11,000 from time to time, right?
A. That is correct, yes.
Q. And what kind of rules did you follow as far as buying toys for kids is concerned?
A. Really wasn't any rules. We just went and bought some toys.
Q. But the prosecutor asked you questions about how influential Mr. Jackson was in running affairs. Didn't he give you a lot of flexibility in just going out, buying hundreds of toys, and then just charging him for it?
A. That is correct, yes.
Q. And where would you go buy those toys?
A. Toys-R-Us.
Q. Okay. Would you drive there yourself?
A. Pretty much Mr. Jackson came along or with 4732

1 the kids or some adults, yes.
2 Q. And Mr. Jackson would from time to time let
3 you drive parents and their children to Toys-R-Us,
4 right?
5 A. That is correct. Yes.
6 Q. And he would tell you to buy them whatever
7 they'd like, right?
8 A. That is correct, yes.
9 Q. You'd spend thousands of dollars on these
10 kids, right?
11 A. That is correct, yes.
12 Q. And that was one of your responsibilities as
13 ranch manager, right?
14 A. That is correct. Yes.
15 Q. To try and take care of the children as best
16 you could, right?
17 A. Correct, yes.
18 Q. Now, what are the safety regulations in
19 effect at the zoo, to your knowledge?
20 A. Well, there's certain regulations for the
21 zoo, especially with the big animals. Again, for
22 the safety of the guests or kids, yes.
23 Q. And you have all these amusement rides as
24 well, right?
25 A. That is correct, yes.
26 Q. Please tell the jury what amusements rides
27 you have for the kids and the parents.
28 A. Well, there's different rides. The Ferris 4733

wheel. They have the merry-go-round. They have a big slide. They have a -- oh, got -- they have the Sea Dragon. They have various rides also for kids, for small kids, yes.
Q. And when you have these busloads of kids and adults show up and they want to use the rides, what safety precautions do you have?
A. Well, we have a -- we just got to make sure that the kids don't get hurt. We have regulations for that. We have personnel there guiding the kids and taking care of the kids so nobody gets hurt.
Q. And the personnel specialize in the amusement park portion of Neverland, right?
A. That is correct, yes.
Q. And are they in charge of maintaining the rides, making sure the machinery's okay?
A. That is correct, yes.
Q. And were they under your supervision?
A. No.
Q. Okay. Who was supervising the people who run the amusement park?
A. There's -- Neverland has different groups of people, you know, like departments, what we call it, and it was the person in charge of the amusement park.
Q. Just like there's a group in charge of the petting zoo and the bigger zoo, right?
A. That is correct, yes. 4734

Q. And when these children and these adults visit Neverland, these different groups are all available to make sure kids are safe, right?
A. That is correct. Yes.
Q. Now, when you have hundreds of children running around Neverland, they can sometimes get into all kinds of mischievous situations, right?
A. Absolutely, yes.
Q. You've seen kids caught in the house in various rooms, right?
A. That is correct.
Q. And they've been politely asked to leave, right?
A. That is correct, yes.
Q. You've seen kids trying to get in doors they're not supposed to get through, correct?
A. Correct.
Q. You've seen kids trying to get into the arcade whenever they can, right?
A. That is correct, yes.
Q. And kids are sometimes caught with things in their hands, little things they found in the main house and they have -- you have to take them away from them, right?
A. That is correct, yes.
Q. And it's never been your understanding that Mr. Jackson is personally supervising all of this, right? 4735

A. No.
Q. In fact, he's amazingly generous in letting people come into his home and go through it, and see it, right?
A. Yes, he is.
Q. And this is a large home that has a lot of beautiful antiques, correct?
A. That is correct, yes.
Q. A lot of family pictures, right?
A. That is correct, yes.
Q. He has things he's collected from all over the world, right?
A. Yes.
Q. And he often lets whoever visits come through the house so they can see all of this, right?
A. Yes.
Q. And when he has guests stay over in the guest quarters, I believe you said that they pretty much can walk into that main house when they want, right?
A. That is correct, yes.
Q. He has staff available all the time to prepare a meal for them if they want one, right?
A. Yes.
Q. And in that kitchen area, you have unlocked -- an unlocked refrigerator area, correct?
A. That's correct. It's open. 4736

Q. And they can go in there all the time and get sodas, right?
A. That is correct.
Q. Juice, right?
A. Yes.
Q. Milk?
A. Whatever their choice is.
Q. And you'll find wine in there, right?
A. That is correct, yes.
Q. And he lets his adult guests go in there and get wine when they choose, correct?
A. That is correct, yes.
Q. And glasses are nearby if they want a glass, right?
A. Yes.
Q. It's a very large refrigerator area, isn't it?
A. It is.
Q. How many glass doors do you think are on that large refrigerated area?
A. Oh, God. About six, eight, something like that.
Q. Six or eight transparent doors they can go into to get all kinds of beer, wine, soda, milk, orange juice, right?
A. That is correct, yes.
Q. And there's a menu that's posted on a blackboard most days, right? 4737

A. That is correct, yes.
Q. And what do you typically find on that menu?
A. You find the menu for the food or whatever the people wants to use.
Q. There's usually some special dishes that the staff are preparing for that day, right?
A. Exactly, yes. Right.
Q. And there also is a standard menu that Michael Jackson printed up that he gives that people have to order from, right?
A. That is correct, yes.
Q. And you got sandwiches and soup and stuff like that, right?
A. Yes.
Q. And on that bar area where people can come anytime of day, you can sit there and just ask whoever is there to prepare eggs or an omelet, whatever you want, right?
A. That is correct, yes.
Q. And there are homemade buns and doughnuts that are put on there every day, right?
A. Right.
Q. Anytime of day, 24 hours a day, you can go into that main house and get what you want, correct?
A. That is correct, yes.
Q. Even when Mr. Jackson is upstairs with his children, very often people will come downstairs to either see the house or get something to eat, right? 4738

A. That is correct, yes.
Q. The prosecutor asked you about candy and ice cream and stuff like that. That's available to everybody, isn't it?
A. That is correct, yes.
Q. It's not just available to children. It's available for adults as well, right?
A. That is correct, yes.
Q. And when you walk into that theater, you've got a whole candy/ice cream area in the front, right?
A. Yes.
Q. And typically, Mr. Jackson will have one of his people there just to serve whatever people want, right?
A. That is correct, yes.
Q. Ice cream sandwiches, ice cream cones, right?
A. Whatever they prefer, yes.
Q. There's a big popcorn area, correct?
A. Correct.
Q. And you will see sometimes visitors looking at movies anytime of day, right?
A. That is correct, yes.
Q. And there's a huge collection of movies they can sometimes choose from, right?
A. Right.
Q. And other times there are just a couple that 4739

you can choose for the day, right?
A. That is correct, yes.
Q. Okay. There are other areas of Neverland people want to see, right?
A. Right.
Q. There are areas where they can see Mr. Jackson's costumes that he's worn on music tours, right?
A. That is correct, yes.
Q. There are areas where they can see his glove? Kids love to see the gloves he's worn, right?
A. That is correct, yes.
Q. In fact, some of the memorabilia from his musical tours around the world are actually in an area not far from the wine cellar; correct?
A. That is correct, yes.
Q. You also have sleeping bags stored down in the area near where the wine cellar is, correct?
A. That is correct.
Q. Did you work there before Mr. Jackson purchased the property?
A. Yes, I did.
Q. That wine cellar area was already there when Mr. Jackson purchased the property, right?
A. Yes, it was.
Q. Now, there is a procedures manual at Neverland that, at least on paper, identifies what 4740

people are supposed to do or not do, right?
A. That is correct.
Q. And security is a concern there, is it not?
A. Yes.
Q. Because if you really look at the perimeter of Neverland, you can get in those fences, can't you?
A. Absolutely, yes.
Q. In fact, it's -- it's easy for anyone to go in or out of those three-rail fences anytime, right?
A. Absolutely.
Q. And you've caught people on the property who tried to get over to Neverland and find Mr. Jackson, correct?
A. Many times.
Q. And there are roads around the property where cars drive at high speeds, correct?
A. Yes.
Q. And there is also a concern that children will somehow wander on the road, right?
A. That is correct, yes.
Q. Let me get back to Janet Arvizo. Didn't she complain one time that she felt Frank and Vinnie were separating her from Michael Jackson?
A. I don't recall her telling me that, no.
Q. Did she complain that Dieter and Ronald were separating her from Michael Jackson? 4741

A. Yes.
Q. She appeared not to like Dieter or Ronald at all, right?
A. That is correct, yes.
Q. When Janet and the children would arrive on the property, were they given assistance in transporting their luggage to their rooms?
A. Absolutely.
Q. Who would help Janet transport her luggage to her rooms?
A. Many times it was security, Neverland Valley security, or myself.
Q. And would Janet pretty much tell you what to carry from her car or however she got there?
A. No, not really.
Q. Who would assign the rooms to the Arvizos when they visited and stayed at Neverland?
A. I did.
Q. And what would determine, for you, what room to put them in?
A. It would depend. Many times we had some other guests on the property. And if we have one available, that was the only one that was going to be for them. And many times I ask them, "Okay, which room do you guys want to stay in?" So that's how I decided.
Q. Did anyone ever complain about the room that they were placed in? 4742

A. No, not really.
Q. Did the kids ever complain?
A. No.
Q. The rooms they were placed in, as far as you're concerned, were all beautiful rooms, weren't they?
A. Yes, they are.
Q. They were cleaned every day, correct?
A. That is correct.
Q. And they had constant room service if they wanted it, right?
A. That is correct. Yes.
Q. Mr. Jackson wanted them treated just as well as any other guests, right?
MR. AUCHINCLOSS: Objection; asked and answered.
THE COURT: Sustained.
Q. BY MR. MESEREAU: How many times, Mr. Salas, has the prosecution contacted you to talk to you about the case?
A. A couple times.
Q. And how many times did you meet with representatives of the sheriff's department?
A. A couple times.
Q. They never asked you if you ever brought nonalcoholic beverages for the Arvizo children, did they? They never asked you that question, did they?
A. No, they didn't. 4743

Q. Now, I think you said that Michael Jackson appeared frustrated at what Frank was doing on the property from time to time, right?
A. That is correct. Yes.
MR. AUCHINCLOSS: Objection; misstates the evidence.
MR. MESEREAU: I don't think it does, Your Honor.
THE COURT: Overruled. The answer was, "Yes." Next question.
Q. BY MR. MESEREAU: Michael Jackson was frustrated that Frank was bringing guests to Neverland without him knowing about it, right?
A. That is correct, yes.
Q. And how old was Frank at the time, do you think?
A. I'm not sure how old was he. I will say he was about, what, 35.
Q. Early twenties?
A. Somewhere around there, yes.
Q. To your knowledge, how was Frank able to bring guests to the property without Michael Jackson knowing about it?
MR. AUCHINCLOSS: Objection; foundation.
THE COURT: Overruled.
You may answer.
THE WITNESS: It was his own decision.
Q. BY MR. MESEREAU: But what would Frank do, 4744

1 if you know, to bring guests onto the property
2 without Michael Jackson knowing about it?
3 A. What he would do there?
4 Q. Yes.
5 A. Just have fun at Neverland.
6 Q. Oh, no, excuse me. I didn't state it
7 properly. It's my mistake.
8 If Frank wanted to bring guests onto the
9 property without Michael Jackson knowing about it,
10 what would he do?
11 A. He would just call security and tell -- let
12 security know that he had some guests coming in, or
13 tell me.
14 Q. Would he typically tell them that Michael
15 wants them visiting?
16 A. No, he never said that.
17 Q. He just said he wanted them to visit, right?
18 A. That is correct.
19 Q. Okay. And he would bring a number of female
20 guests from time to time, correct?
21 A. Correct.
22 MR. AUCHINCLOSS: Objection; relevance.
23 THE COURT: Overruled. The answer is,
24 "Correct."
25 Q. BY MR. MESEREAU: In fact, he tried to bring
26 a lot of girls onto the property, didn't he?
27 A. That is correct.
28 Q. He used to brag to them that he was a friend 4745

to Michael Jackson, right?
MR. AUCHINCLOSS: Objection. Hearsay;
relevance.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Now, you mentioned someone
named Malnik visited the property one time, right?
A. Right.
Q. Did you speak to him?
A. Not in a conversation, no, I didn't.
Q. You just saw him?
A. Just saw him, say hi. And that was it.
Q. The prosecutor mentioned someone named Zia,
right?
A. That's correct. That is correct.
Q. Did you see Zia on the property?
A. Yes, I did.
Q. Did you talk to him?
A. Just for a short time. Not --
Q. And Zia was, to your knowledge, Mr.
Jackson's attorney, right?
A. Yes.
Q. Did you see him there often?
A. No, I only saw him there a couple times.
Q. And what did you see him doing?
A. Just had a meeting with Mr. Jackson.
Q. Okay. You would see all kinds of people
visit from time to time to meet with Mr. Jackson,
right? 4746

A. Yes.
MR. AUCHINCLOSS: Objection; vague.
MR. MESEREAU: I'll rephrase.
Q. The prosecutor has limited his questions to you to Dieter, Ronald, Frank. Mr. Jackson didn't spend all of his time meeting with these people, did he?
A. Not all the time, no.
Q. Mr. Jackson from time to time would have numerous visitors to Neverland to see him, correct?
A. That is correct.
MR. AUCHINCLOSS: Objection; vague as to time.
THE COURT: Overruled.
You may answer.
THE WITNESS: That is correct.
Q. BY MR. MESEREAU: You would often see a full schedule of people visiting Neverland to see Mr. Jackson, right?
MR. AUCHINCLOSS: Objection; foundation.
THE COURT: Overruled.
You may answer.
THE WITNESS: That is correct.
Q. BY MR. MESEREAU: Do you recall Mr. Jackson doing work in his studio at Neverland?
A. Yes.
Q. And what do you recall seeing him doing?
A. Doing some recording. Dancing. Practicing. 4747

1 Yes.
2 Q. Did you watch him practice dance?
3 A. No, I didn't.
4 Q. And how did you know he was practicing
5 dance? Would he tell you?
6 A. Right.
7 Q. And would he tell you not to let anyone in,
8 that he's doing his creative work?
9 MR. AUCHINCLOSS: Objection; hearsay.
10 THE COURT: Overruled.
11 You may answer.
12 THE WITNESS: Because of his work, yes, he
13 did not want to be bothered, yes.
14 Q. BY MR. MESEREAU: Did you also see him
15 teaching kids how to dance from time to time?
16 A. I never saw that.
17 Q. Okay. How about in his recording studio,
18 would he bring kids and adults into his recording
19 studio to see it?
20 A. Yes, he did.
21 Q. And didn't he used to show them how he does
22 his work in his recording studio?
23 A. Yes.
24 Q. And sometimes he wanted to just be left
25 alone in there, right?
26 A. That is correct. Yes.
27 Q. And when he wanted to be left alone, he'd
28 spend hours and hours in there, right? 4748

A. That's correct, yes.
Q. Okay. Now, you would see Mr. Jackson awake on his property at all different hours, right?
A. Yes.
Q. Sometimes he gets up at 3:00 in the morning, doesn't he?
A. That is correct, yes.
Q. And he will take walks alone on his property, right?
A. That's right.
Q. That's how he does a lot of his composing, right?
A. That is correct.
MR. AUCHINCLOSS: Objection; foundation.
THE COURT: Sustained.
Q. BY MR. MESEREAU: You'd also see Mr. Jackson from time to time driving alone on his property, right?
A. That is correct, yes.
Q. Would you know in advance if Mr. Jackson was going to leave the property to go somewhere?
A. Yes.
Q. And who would you -- who would tell you that Mr. Jackson was leaving the property?
A. Sometimes I found out about -- by his bodyguard.
Q. Okay. And what are some of the other ways that you would find out Mr. Jackson might be either

leaving the property or going out of town?
A. By Mr. Jackson.
Q. Okay. Did you speak to Mr. Jackson every day when he was there?
A. Pretty much, yes.
Q. When he wasn't there, who would you speak to?
MR. AUCHINCLOSS: Objection. Ambiguous; relevance.
THE COURT: Overruled.
THE WITNESS: When he wasn't there, well, nobody is -- the ranch manager.
Q. BY MR. MESEREAU: Let me ask you this: When Mr. Jackson's out of town, which you saw him do quite often during your 20 years there, right?
A. Right.
Q. You saw him go on music tours, right?
A. That is correct.
Q. And you saw him travel to various cities in America, right?
A. Yes.
Q. And he would travel to various cities around the world, right?
A. Yes.
Q. When he's not there, does the place pretty much run the way it runs when he's there?
A. It runs the same way.
Q. And that's because there are various 4750

1 procedures in effect to make sure it runs properly,
2 correct?
3 A. That is correct, yes.
4 Q. When Mr. Jackson's there, he's not walking
5 around the property just running everything, is he?
6 A. No, no.
7 Q. In fact, very often when he's there, you
8 hardly see him, right?
9 A. That is correct, yes.
10 Q. Because Mr. Jackson is doing his creative
11 work for hours and hours on end, right?
12 A. Correct.
13 Q. So how does the place sort of run when he's
14 not there? I mean, if you can explain it.
15 A. Because of the people in charge of running
16 the place, so we'll -- the place always running the
17 same, so -- whether he's there or not.
18 Q. And even if he's there, you have to report
19 to other individuals to get information, don't you?
20 A. That is correct, yes.
21 Q. Okay. So when the prosecutor asked you
22 about your reporting directly to Michael Jackson,
23 you didn't mean you're talking to him all day about
24 what's going on?
25 A. No.
26 Q. And if you report to him on a given day, it
27 might be just one time, right?
28 A. That is correct, yes. 4751

Q. Okay. In response to the prosecutor's questions, you mentioned some things about Frank saying he'll take care of things, correct?
A. Correct, yes.
Q. But Frank also used to brag about how close he was to Michael Jackson, didn't he?
A. Right.
Q. You didn't get the impression he was always telling the truth, did you?
MR. AUCHINCLOSS: Objection; calls for a conclusion.
THE COURT: Sustained.
Q. BY MR. MESEREAU: You said, in response to the prosecutor's questions, that on occasion you would see Frank and Michael Jackson together, right?
A. Right.
Q. But you also often saw Frank not around Mr. Jackson, correct?
A. Oh, yes.
Q. And you often saw Mr. Jackson without Frank, right?
A. That is correct, yes.
Q. And you didn't really know what work Frank was doing, correct?
A. That is correct, yes.
Q. But from time to time, he would try and brag that he was in the music business, right?
A. Correct. 4752

MR. AUCHINCLOSS: Objection; hearsay.
THE COURT: Sustained.
Q. BY MR. MESEREAU: I want to ask you a little more about security at Neverland, okay? It's about 2800 acres of property, right?
A. Uh-huh.
Q. Very spread out over hills, right?
A. Yes.
Q. And it's surrounded by these fences that you said anybody could come in, right?
A. That is correct, yes.
Q. You have a front gate that you have to stop at if you're driving in, right?
A. Correct.
Q. And you have to push a button and identify who you are, right?
A. That is correct, yes.
Q. And people at that security gate typically have a list of who's supposed to be allowed in, right?
A. Right.
Q. And I think what you said is that Frank would often call the people at that gate and say, "Let so and so in," right?
A. That is correct, yes.
Q. Okay. Now, you did indicate there had been efforts by people to drive and get onto the property and find Mr. Jackson, right? 4753

A. Right.
Q. And you have some security guards who patrol the property a bit, right?
A. Correct.
Q. And they don't have weapons, right?
A. Not to my knowledge.
Q. Because Michael Jackson doesn't want weapons on his property, right?
A. Correct.
MR. AUCHINCLOSS: Objection. Foundation; hearsay.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you know whether or not Mr. Jackson has a policy that he doesn't want weapons on his property?
A. Yes, I do.
Q. And he's typically very concerned about his children's safety, correct?
A. That is correct.
Q. You said that Frank was staying in the video library, right?
A. Correct.
Q. And was there a bed in there?
A. It's a couch that turns into a bed, yes.
Q. Is that where he would stay when he visited?
A. Correct.
Q. There were long periods of time Frank wasn't even there, right? 4754

MR. AUCHINCLOSS: Objection as to -- vague as to time.
Q. BY MR. MESEREAU: Let's go to 2003. I'll rephrase it, Your Honor.
THE COURT: All right.
Q. BY MR. MESEREAU: Let's take the year 2003. There were periods of time you wouldn't even see Frank on the property, right?
A. There was some times, yes.
Q. And there are times you would also see him, correct?
A. Correct. Yes.
Q. There were times you would see Dieter on the property, right?
A. Correct.
Q. And there were times you wouldn't see him at all, right?
A. Correct. Yes.
Q. There were times you'd see Ron on the property, correct?
A. That is correct. Yes.
Q. And there were times you wouldn't see him at all?
A. Right.
Q. And during this period of time, you had your constant visitors on a daily basis to the property, correct?
A. Yes. 4755

Q. You had many other people who had scheduled meetings with Michael Jackson, right?
A. Right. Yes.
Q. And you also had your periodic tours of children and adults to Neverland, right?
A. That is correct, yes.
Q. You indicated that you think that Mr. Jackson was at Neverland when the Arvizos visited in 2003, right?
A. Right.
Q. You're not sure that he was there every day, though, are you?
A. That is right, yes.
Q. If there were days he wasn't there when the Arvizos were there in 2003, you're just not sure, correct?
That's a bad question. Let me -- I don't think I could answer that one.
In 2003 when the Arvizos were at Neverland, sometimes Michael Jackson was there and sometimes he wasn't, right?
A. That is correct. There was days that he was not there, yes.
Q. There were times he was out of town, right?
A. Right.
Q. There were times he was gone from the premises during the day, right?
A. That is correct, yes. 4756

1 Q. There were times he was in his studio,
2 right?
3 A. That is correct, yes.
4 Q. There were times he was doing his dance
5 routines, correct?
6 A. Correct.
7 Q. There were times he was taking children
8 around Neverland on a tour, right?
9 A. Correct, yes.
10 Q. And there would be constant meetings of one
11 form or another involving Michael Jackson with other
12 people, correct?
13 A. That is correct, yes.
14 Q. Okay. The prosecutor asked you about
15 Michael Jackson playing with kids. Michael Jackson
16 plays with kids all the time at Neverland, doesn't
17 he?
18 A. Yes, he does.
19 Q. He often acts like a kid himself, doesn't
20 he?
21 A. Yes.
22 Q. And he takes pride particularly in bringing
23 inner city kids to Neverland to have fun, doesn't
24 he?
25 A. Correct. Yes.
26 Q. We're talking about kids from poverty, kids
27 from broken homes, right?
28 A. That is correct, yes. 4757

Q. He sometimes personally arranges those visits himself, doesn't he?
MR. AUCHINCLOSS: Objection; foundation.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you know whether or not Michael Jackson sometimes personally arranges visits by kids to Neverland?
A. Yes.
Q. And typically when these busloads of kids get to Neverland, they all want to see Michael Jackson, right?
A. Correct.
Q. And sometimes you schedule all these kids and these adults to be at a certain location to wait for Michael to come out and see them, right?
A. That is correct.
MR. AUCHINCLOSS: I'll object as cumulative.
THE COURT: Overruled.
Q. BY MR. MESEREAU: Isn't that true?
A. That is correct, yes.
Q. And he would call you and arrange to have toys available for all these kids when they would visit, right?
A. Correct.
Q. And you would typically have all the kids assemble on the property, and staff would start distributing toys to them, right?
A. That is correct, yes. 4758

Q. And very often in the middle of the toy distribution, Michael comes out to see the kids, right?
A. On some occasion, yes.
Q. And you'll see them running to Michael. They want to see him; they want to touch him, right?
A. Correct.
Q. The adults will do the same, correct?
A. Correct, yes.
Q. Now, the prosecutor asked you what these children do at Neverland, and you talked about bike riding.
A. Yes.
Q. What did you mean by bike riding?
A. He's got so many toys, they can just take off on the quad-runners, scooters. That's what I meant.
Q. And you never got the impression Michael Jackson was supervising the bike riding, did you?
A. No.
Q. People on the property who worked for Mr. Jackson take care of that, don't they?
A. Especially security, yes.
Q. And also you expect the parents or the adults in charge to have some responsibility, right?
A. Yes.
Q. You talked about quads, okay. And what did you mean by that? 4759

A. They have those four-wheelers that they can go off, off the road. That's --
Q. And they typically ride on the roads at Neverland, right?
A. Yes.
Q. And who supervises that, typically?
A. Oh, themself. Themselves or security.
Q. You have never thought Michael Jackson was walking around supervising who got into those vehicles, did you?
A. No, no.
Q. He doesn't seem to supervise any of that, does he?
A. No, he doesn't.
Q. Okay. He assumes staff on the premises will, right?
MR. AUCHINCLOSS: Objection. Objection. No foundation, as to what Mr. Jackson assumes. Calls for speculation.
THE COURT: Sustained.
Q. BY MR. MESEREAU: You told the prosecutor that sometimes Michael Jackson would play with kids on a daily basis, right?
A. That is correct, yes.
Q. And you would see him playing with kids all over the premises, right?
MR. AUCHINCLOSS: Objection; asked and answered. 4760

1 THE COURT: Sustained.
2 Q. BY MR. MESEREAU: Did you see Michael
3 Jackson take these kids to the petting zoo?
4 A. Yes.
5 Q. Did you see him take them to the bigger zoo?
6 A. Yes.
7 Q. Did you see him take them to the arcade?
8 A. Yes.
9 Q. Did you see him take them to the theater?
10 A. Yes.
11 Q. How about ride with them on the train?
12 A. Correct.
13 Q. Okay. This went on all the time, didn't it?
14 A. That is correct, yes.
15 Q. Now, the prosecutor asked you questions
16 about Mr. Jackson appearing intoxicated, okay?
17 A. Right.
18 Q. Now, you never saw him drinking, right?
19 A. No, I didn't.
20 Q. And were you aware that there were times
21 when he had a prescription drug problem?
22 A. Yes, I -- yes, I was.
23 Q. And he had gotten a lot of injections from
24 various physicians?
25 A. That is correct, yes.
26 MR. AUCHINCLOSS: Objection; foundation.
27 THE COURT: Sustained.
28 Q. BY MR. MESEREAU: Did you know Michael 4761

Jackson had -- excuse me, let me rephrase. Did you know whether or not Mr. Jackson at various times had a prescription drug problem?
A. Yes, I did.
Q. And did you know he was treated for that?
A. Yes.
Q. When you saw him appearing intoxicated, you don't know what the cause was, correct?
A. That is correct, yes.
Q. You knew he had suffered severe burns on his body, didn't you?
MR. AUCHINCLOSS: Objection. Foundation; relevance.
THE COURT: Foundation; sustained.
Q. BY MR. MESEREAU: Did you know whether or not, during one entertainment event, Mr. Jackson suffered severe burns all over his body?
MR. AUCHINCLOSS: Ob -- I'll --
THE WITNESS: Yes.
Q. BY MR. MESEREAU: Did you know he was being treated for that?
MR. AUCHINCLOSS: Objection; vague as to time.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Did you know whether or not Mr. Jackson was being treated by physicians with medication because he'd been badly burned?
MR. AUCHINCLOSS: Objection; vague as to 4762

time.
Q. BY MR. MESEREAU: At any time?
A. Yes.
Q. That was common knowledge at Neverland, was it not?
MR. AUCHINCLOSS: I'll object and move to strike the last answer. Still vague as to time.
THE COURT: Stricken.
Q. BY MR. MESEREAU: During the year 2002, were you aware -- excuse me. During the year 2002, do you know whether or not Michael Jackson was being treated by various physicians for health problems?
MR. AUCHINCLOSS: Objection. Vague as to "health problems."
THE COURT: Overruled.
You may answer.
MR. AUCHINCLOSS: I'll object as to foundation.
THE COURT: The answer -- the question calls for a "yes" or "no" answer. You may answer.
THE WITNESS: Yes.
Q. BY MR. MESEREAU: And during the year 2002, were you aware that Mr. Jackson --
MR. AUCHINCLOSS: Objection to the form of the question. "Were you aware" assumes facts.
THE COURT: You have to let him finish the question.
Q. BY MR. MESEREAU: During the year 2002, were

you aware -- excuse me. During the year 2002, did you know whether or not Mr. Jackson was taking medications for a broken leg?
A. Yes.
Q. During the year 2002, did you know whether or not Mr. Jackson was taking medications for a foot problem?
A. Yes.
Q. And during the year 2002, did you know whether or not Mr. Jackson had recurring problems because he had been badly burned?
A. Yes.
Q. During the year 2002, did you know whether or not Mr. Jackson had back problems?
A. Yes.
MR. AUCHINCLOSS: I'm going to object as to foundation.
THE COURT: Sustained.
Q. BY MR. MESEREAU: During the year 2003, did you know whether or not Mr. Jackson was taking prescription drugs for a leg problem?
MR. AUCHINCLOSS: Objection; foundation.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you know whether or not Mr. Jackson took prescription drugs in the year 2003 while you were working there?
MR. AUCHINCLOSS: Objection; foundation.
THE COURT: Overruled. 4764

1 THE WITNESS: Yes.
2 Q. BY MR. MESEREAU: Do you recall seeing Mr.
3 Jackson's children in his bedroom?
4 A. Yes.
5 Q. They would be in there a lot during the time
6 you worked there, right?
7 A. That is correct, yes.
8 Q. You would see his children at the lower
9 level, right?
10 A. Correct.
11 Q. You would see them in his bedroom upstairs,
12 right?
13 A. Correct, yes.
14 Q. Did you typically spend much time with Mr.
15 Jackson's children?
16 A. I would say I didn't spend too much time
17 with them because -- but saw them, I mean, every day
18 there, yes.
19 Q. Every day?
20 A. Yes.
21 Q. And you would mainly see them in the main
22 house?
23 A. Yes.
24 Q. Would you see them on the property also?
25 A. Yes.
26 Q. But you saw them in his room quite often,
27 didn't you?
28 A. Yes. 4765

Q. Do you know anything about an alarm system that one has to use to get into Mr. Jackson's bedroom?
MR. AUCHINCLOSS: Objection; vague as to "one has to use" an alarm system.
THE COURT: Overruled.
You may answer.
THE WITNESS: Yes.
Q. BY MR. MESEREAU: And have you set off that alarm from time to time?
A. No, not really.
Q. Have you heard the alarm go off?
A. No.
Q. Okay. Do you know much about that alarm system?
A. I know about it, but I -- you know, not -- didn't get involved in that too much.
Q. It's not something that you would typically handle?
A. No.
Q. Okay. Okay. Have you seen Mr. Jackson entertain adults at his home in the evening?
A. Oh, yes.
Q. He does that quite often, doesn't he?
A. That is correct, yes.
Q. And when he does that, you often see adults drinking alcohol, don't you?
A. Right. 4766

Q. You see staff serving them alcohol, right?
A. That's correct.
Q. And they're free to go into the kitchen area and grab alcohol if they want to, typically, right?
A. That is correct, yes.
Q. You've also seen them served alcohol in his bedroom, correct?
A. Correct.
Q. You've seen adults sitting in the lower level of his bedroom drinking, right?
A. That is correct, yes.
Q. And typically there would be an order placed by someone, and staff will bring alcohol into his bedroom for that purpose, right?
A. Right.
Q. Okay. Now, the prosecutor asked you about complaints involving kids in the wine cellar, right?
A. Right.
Q. During the 20 years you worked at Neverland, that area you call the wine cellar was always a wine cellar, was it not?
A. That is correct, yes.
Q. And this is the area that you said, close by, has an area which has Mr. Jackson's memorabilia from tours around the world, right?
A. Correct, yes.
Q. And in that area nearby is where you can see his costumes, his gloves, and things of that sort, 4767

right?
A. That is correct, yes.
Q. And typically kids and adults want to go there and see all these costumes from his very successful music career, right?
A. That is right, yes.
Q. And once in a while, somebody will bring people down to that cellar area so they can see all that memorabilia, right?
A. Right.
MR. AUCHINCLOSS: Objection. Misstates the evidence that the memorabilia is in the cellar area.
MR. MESEREAU: That's what he testified to, Your Honor.
THE COURT: No, it's not. Rephrase your question.
MR. MESEREAU: Yes, sir.
Q. Let's take the area that we've identified as the wine cellar, okay? You got to go down the stairs to get there, right?
A. Right, yes.
Q. When you get down those stairs, where do you see the wine cellar when you reach the foot of the stairs?
A. It's on the wall. Placed on the wall.
Q. There are other areas around the wine cellar which have other purposes in the house, right?
A. Right. 4768

Q. And doesn't one of those areas have costumes, gloves, and memorabilia from Mr. Jackson's tours?
A. Not specifically in that area.
Q. Well, it's not far away, though, right?
A. It's outside there.
Q. But you can certainly -- from time to time, he has stored stuff there, hasn't he?
A. Yes. I would say that, yes.
Q. And sometimes people have gone down to look at that stuff, right?
A. That is correct, yes.
Q. And there's some other areas at Neverland where that stuff is stored as well, right?
A. The main part, yes.
Q. Because there's a ton of stuff.
A. Yes.
Q. From a long, successful career.
A. Yes.
Q. Now, during the 20 years you've been at Neverland, there have been very few complaints about children being in the wine cellar, right?
A. That is correct.
Q. You're talking about maybe a couple over a 20-year period, right?
A. That is correct, during my time there, yes.
Q. Mr. Jackson's policy is not to let kids in the wine cellar, right? 4769

A. That is correct, yes.
Q. The prosecutor talked about young boys from Los Olivos, and you identified their pictures, right?
A. Right.
Q. And you've seen them there with their parents from time to time, haven't you?
A. No, not with their parents.
Q. The parents have visited?
A. Yes, yes.
Q. But they also have come from time to time on their own, correct?
A. Themself, yes.
Q. And they've come from time to time when Mr. Jackson wasn't even there, right?
A. That is correct, yes.
Q. And people on the property know them, correct?
A. Correct.
Q. And generally nobody objects to their visiting Neverland, right?
A. That is correct, yes.
Q. They sometimes come alone and they sometimes come with their parents, right?
A. Yes.
Q. They're really neighbors, aren't they?
A. Yes.
Q. And once in a while they've gotten into some 4770

trouble there, correct?
A. That is correct, yes.
Q. They've been known as mischievous kids, right?
A. Right.
Q. They've been caught in various places around Neverland, haven't they?
A. That is correct, yes.
Q. They've been caught in rooms, true?
A. Correct.
Q. They were caught playing hide-and-seek in the house, weren't they?
A. Right, yes.
Q. Now, if you catch kids playing hide-and-seek in the house or getting into trouble, typically what do you do?
A. Well, you try to explain to them that -- you know, if you caught them doing something they're not supposed to be doing, you just let them know that, you know, that's not what they should be -- you know, that there's some certain things that, you know, they're allowed to do, there's things that they're not allowed to do, so we let them know.
Q. But like -- let's take these kids from Los Olivos that are neighbors who are allowed on the property, and sometimes their parents aren't there. Who kind of watches them when they come alone?
A. Pretty much nobody. They're on their own. 4771

Q. Do people on the property keep an eye on them, or what happens?
A. Well, you know, I would say yes, security, just for safety reasons, yes. Or the staff personnel if they're at the amusement park, yes.
Q. If they go into the main house, which they do from time to time, who would be in the main house typically, who might see them?
A. I would say that will be the maids, the cooks, yes. Or myself.
Q. And if they start going upstairs into the bedrooms, who are they likely to run into?
A. Well, they'll run into the doors. They can't go in.
Q. Besides the doors, who might they see? Will they see the people who are cleaning?
A. Yes, they might run into maids or somebody else from the house staff. Yes.
Q. And how many kids are we talking about?
A. We're talking about the --
Q. Three?
A. Three kids, yes.
Q. All right. And how long have they been coming onto the property, to your knowledge? Excuse me, let me rephrase that.
When you were working there, for how long a period of time do you remember their coming freely on and off the property? 4772

A. They would come in frequently.
Q. Regularly?
A. Yes.
Q. Would it be in the evening, morning,
weekends? What would it be?
A. It would be weekends or days, yes.
Q. And how would they get on? Would they go
through the main gate?
A. Yes, they did.
Q. And do people in the main gate know them?
A. Yes.
Q. And do they typically just let them walk
onto the property?
A. Yes.
Q. Would somebody drive them anywhere?
A. Well, sometimes they drove to the place,
so -- yes, they drove their own car.
Q. And how old were these young boys?
A. Young kids; 15, 16.
Q. 15, 16?
A. Yes, yes.
Q. And they're the ones that got in trouble
from time to time?
A. Right.
Q. All right. Would anyone call their parents
up typically and say, "Your teenaged kids are in
trouble"?
A. Not my knowledge. 4773

Q. Okay. Were they ever asked to leave the property, to your knowledge?
A. Not to my knowledge.
Q. Actually, Mr. Jackson didn't want them to get in trouble with their parents, did he?
MR. AUCHINCLOSS: Objection. Calls for speculation; no foundation.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Let me ask you a few more questions about the Arvizos at Neverland. You saw the Arvizo children roaming freely around Neverland when they stayed there, correct?
A. Correct.
Q. They'd use the amusement rides when they chose, correct?
A. That is correct.
Q. They'd go into the theater when they wanted to, right?
A. Right.
Q. They jumped on the train when they wanted to, right?
A. Correct.
Q. And they would visit the zoo when they chose, right?
A. That is correct, yes.
Q. Did you ever see the mother supervising the children at Neverland?
A. No.

Q. Did you ever see her keeping an eye on the children at Neverland?
A. No.
Q. When you saw them at the zoo, do you recall the mother ever being with them?
A. No.
Q. When you saw the Arvizo children at the amusement park on the rides, did you ever see the mother with them?
A. No.
MR. AUCHINCLOSS: Objection; cumulative.
THE COURT: Overruled.
THE WITNESS: No.
Q. BY MR. MESEREAU: When you saw the Arvizo children on the train, did you ever see their mother with them?
A. No.
Q. When you saw the Arvizo children in the theater, did you see the mother with them?
A. No.
Q. But you saw the mother eating in the main house, didn't you?
A. That is correct, yes.
Q. And you saw her walking around the property, right?
A. Right.
Q. Would you describe the Arvizo children as mischievous? 4775

A. At some point.
Q. Well, they got in trouble at the amusement park, didn't they?
A. Yes.
Q. Tell the jury what happened.
MR. AUCHINCLOSS: Objection; 403.
THE COURT: The objection is overruled. But we're going to take our break, so we'll start with that question when we come back.
(Recess taken.)
THE COURT: Counsel? Go ahead.
MR. MESEREAU: Thank you, Your Honor.
Q. Just a couple more questions.
You mentioned that the Arvizo family returned to Neverland a number of times in 2003, right?
A. That is correct, yes.
Q. Do you know how they got to Neverland?
A. I believe they did on the limo.
Q. A limo?
A. Yes.
Q. Was it your impression that the Arvizos had access to a limousine service when they wanted to?
MR AUCHINCLOSS: Objection; foundation.
MR. MESEREAU: I think there is a foundation, Your Honor.
THE COURT: I'll sustain the objection.
Q. BY MR. MESEREAU: You indicated that on at 4776

1 least one occasion you called a limousine service so
2 the Arvizos could leave Neverland, right?
3 A. That is correct. Yes.
4 Q. And you said on the other occasion you took
5 Michael's Rolls Royce and drove them yourself,
6 right?
7 A. Correct.
8 Q. And that was in the middle of the night when
9 Janet wanted to leave, right?
10 A. That is correct, yes.
11 Q. And I believe you said on other occasions
12 when the Arvizos left Neverland, it was your
13 understanding they always had a limousine, correct?
14 A. That is correct, yes.
15 Q. Do you know who would arrange for the
16 limousines to transport the Arvizos?
17 A. I called them personally.
18 Q. You would do it personally?
19 A. Yes.
20 Q. How many times do you think you personally
21 called a limousine service to transport the Arvizos?
22 A. I think it was around three times.
23 Somewhere around there.
24 Q. Is there a particular limousine service that
25 you would normally call?
26 A. It's out of Santa Barbara. And it's
27 called -- what is it called? Limo Link, I believe.
28 Q. Okay. Now, you wouldn't discuss with 4777

Michael Jackson the fact that you wanted to call a limousine service, right?
A. No.
Q. You had enough authority to do that if you thought it was the appropriate thing to do, right?
A. That is correct, yes.
Q. And was it your understanding that from time to time guests of Mr. Jackson would need a limousine?
A. Correct.
Q. And you would get a call from someone asking for you to arrange for a limousine, correct?
A. That is correct, yes.
Q. Actually, Mr. Jackson was pretty generous with arranging for limousines to take his guests off the property, wasn't he?
A. Correct, yes.
Q. Do you recall Janet Arvizo from time to time leaving the premises to go into town?
A. I believe there was only one time.
Q. And did she talk to you about that?
A. Yes, she did.
Q. Was it your understanding she was getting a body wax that day?
A. That is correct, yes.
Q. And was it arranged for a limousine to take her to the body wax place?
A. No, it wasn't. 4778

Q. How did she get to the body wax place?
A. I sent one of the maids with her.
Q. So you arranged for a maid to drive her to the body wax?
A. That, yes.
Q. That was a salon, right?
A. That is correct.
Q. And was that in Los Olivos, if you know?
A. Los Olivos or Solvang, somewhere in there.
Q. Okay. Okay. She was away for quite a while that day, correct?
A. Correct, yes.
Q. Do you recall it being three or four hours?
A. Somewhere around there, yes.
Q. Now, did Janet tell you she wanted to get a body wax at a salon that day?
MR. AUCHINCLOSS: Objection; hearsay.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Why did you arrange for one of the maids to drive Janet Arvizo off the premises to get a body wax?
MR. AUCHINCLOSS: Objection. Foundation; hearsay.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you know why one of the maids drove Janet Arvizo off the premises to get a body wax?
MR. AUCHINCLOSS: Same objection. 4779

THE COURT: Sustained.
Q. BY MR. MESEREAU: Were you in charge of the maid who drove Janet Arvizo off the premises to get a body wax?
A. Yes, I was.
Q. Did you ask the maid to do that?
A. Yes, I did.
MR. AUCHINCLOSS: Objection; hearsay.
THE COURT: Overruled.
Q. BY MR. MESEREAU: Why did you ask the maid to do that?
A. Well, I figured it was a --
MR. AUCHINCLOSS: Objection. Hearsay; foundation.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you know which car the maid used?
MR. AUCHINCLOSS: Objection; relevance.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Just a couple more questions. Do you recall -- do you recall Mr. Jackson traveling to Florida during 2003?
A. Yes.
Q. Do you recall Mr. Jackson traveling to Las Vegas during 2003?
A. Yes.
Q. Do you recall him traveling anywhere else, if you can recall? 4780

A. Pretty much, that I can remember was just Florida and Vegas.
Q. Okay. Finally, the prosecutor asked you questions about some beds in the theater. Remember that?
A. Correct.
Q. Aren't those hospital beds for handicapped kids?
A. Yes, they are.
MR. MESEREAU: No further questions.

REDIRECT EXAMINATION
BY MR. AUCHINCLOSS:
Q. Mr. Salas, those hospital beds in the theater, does Mr. Jackson use those beds personally?
A. Occasionally, yes, to watch a movie.
Q. Do other kids who were not handicapped use those beds?
A. Yes, they do.
Q. As far as the limousines go, you testified on direct examination that you were told not to let the Arvizos off the property unless you got approval; is that correct?
A. That is correct, yes.
Q. And you said that you arranged for three limousines -- three times that you arranged for limousines to transport the Arvizos off the property? 4781

A. That I can remember, yes.
Q. Okay. Was this all -- those three times,
were they all in 2003 during that period of time
you've testified about?
A. I believe it was one time in 2002.
Q. Okay. So the other two times that you
ordered a limousine service to transport the
Arvizos, did you get permission from somebody at the
ranch to let them off the property?
A. Yes, I did.
Q. Who did you get permission from?
A. I got permission from -- it was Frank, yes.
Q. All right. You talked a little bit about a
time at the dinner table when you suspected that
Gavin had been drinking. Do you remember --
A. Correct.
Q. -- testifying about that?
Was Michael Jackson present at the dinner
table that night?
A. No, he was not.
Q. Was Frank present at the dinner table that
night?
A. Yes, he was.
Q. And did you ultimately determine whether
Gavin had been drinking that night?
A. Didn't really specify that, but I -- just by
the way he was acting, I knew that he was drinking.
Q. Was there another time when you saw Gavin 4782

1 when he appeared to be drinking?
2 A. That was the only time.
3 Q. And that only time that you saw him
4 drinking, that he appeared to be intoxicated, what
5 was he doing that made you think that?
6 A. The way he was acting, just not normal.
7 Just his reactions.
8 Q. Had you had occasion to see Gavin a number
9 of times before that or after that when he was
10 acting normal, in your opinion?
11 A. Ask the question again.
12 Q. I guess my question is, did you have a good
13 frame of reference for judging whether Gavin was
14 acting normal or not?
15 MR. MESEREAU: Objection. Vague;
16 foundation.
17 THE COURT: Overruled.
18 You may answer.
19 THE WITNESS: That was the only time I saw
20 that I noticed that.
21 Q. BY MR. AUCHINCLOSS: Okay. So my question
22 was, did you spend enough time around Gavin to feel
23 as if you could make a call as to whether or not he
24 was acting drunk or not? Do you understand that
25 question?
26 A. Yes, I do.
27 I would say yes, I --
28 Q. Okay. And how was he acting that made you 4783

think he was -- how was he acting differently on that evening that made you think he was drunk?
A. Pretty simple. Just when somebody's drunk, I mean, you can tell by the way they look, their reaction, of the way they look, the way they talk. Just verbal, the way he was talking.
Q. Was it obvious to you he'd been drinking?
A. I would say yes.
Q. And you said Frank was at the table. Who else was at the table that night?
A. I believe it was Vinnie and some of Frank's guests, I believe it was. A couple girls, something like that.
Q. Was Gavin's mother around?
A. No, she was not.
Q. Now, as far as where the kids slept -- and maybe I'll back up, because I don't think I asked this question.
What time of day was it that you saw Gavin where you thought he'd been drinking?
A. I would say it was about around nine o'clock, nighttime.
Q. Nighttime?
A. Uh-huh.
Q. Was Mr. Jackson on the property at that time?
A. Yes, he was.
Q. When children slept in Mr. Jackson's 4784

bedroom, do you know, personally know, where they slept in the bedroom, as far as where they slept, upstairs or downstairs? Did you see it?
A. I didn't see exactly who slept on Mr. Jackson's bed, but I know there was kids there and -- yes.
Q. So you never spent the night in Mr. Jackson's bedroom, I take it?
A. No.
Q. So you don't know where the kids slept after you left the room?
A. No.
Q. But you were in the room at times when kids were there?
A. Right. Yes.
Q. And in terms of these kids, were they all boys that slept in Mr. Jackson's room?
A. Pretty much, yes.
Q. Now, Mr. Mesereau asked you about the first-class treatment that everyone received at Neverland. And you basically said that the adults got first-class treatment, too?
A. That is correct, yes.
Q. Okay. So did the kids get the same first-class treatment that the adults did?
A. Absolutely.
Q. Were they basically treated just like the adults? 4785

A. Just like the adults.
Q. And these kids, when they were at Neverland during the 20 years you were there, did these kids ever have supervision?
A. Do you mean by --
Q. By Neverland. Any organized supervision of these children while they were at Neverland?
A. We really didn't have supervision. They had security that would keep an eye on the guests, or even the Neverland staff working at certain places, they had to make sure that the kids were safe. Not supervising them, but just for safety.
Q. Okay. So if an employee was around and saw something dangerous, they might intervene; is that fair to say?
A. Of course, yes.
Q. But the employees, they weren't running around supervising these kids where they were?
A. No.
Q. They were allowed to run around wherever they wanted, do whatever they wanted?
A. Absolutely.
MR. MESEREAU: Objection; leading.
THE COURT: Sustained.
MR. AUCHINCLOSS: Some of this is offered as impeachment.
THE COURT: Well, that was leading, so....
MR. AUCHINCLOSS: All right. 4786

Q. Now, as far as the busloads of children go, were these children treated differently than the children who were guests at Neverland?
A. No.
Q. Were the busloads of children allowed to spend the night in Michael Jackson's room?
A. None of those kids spent the night in his room.
Q. Okay. Were they given the access code to the house?
A. No.
Q. Okay. Were they allowed to -- were these children, did they bring their own supervision with them, adult supervision?
A. Yes, they did.
Q. Was it organized? Were they organized as to where they would go and how they would spend their time at Neverland?
A. Absolutely, yes.
Q. Was Mr. Jackson even there when those busloads of kids would arrive or be there?
A. Many times he was there. Many times he wasn't there.
Q. Okay. When he was there, would he always come out or sometimes come out?
A. Sometimes come out.
Q. So there were times busloads of kids would arrive and Mr. Jackson wouldn't even come out to say 4787

hi?
A. Yes. There was times that he --
MR. MESEREAU: Objection. Leading;
misstates the evidence.
THE COURT: Overruled. The answer is, "Yes."
Next question.
Q. BY MR. AUCHINCLOSS: As far as Janet, when
she was -- when she left Neverland the first time
with her family, in the interview with the sheriff's
department, didn't you say that, "The whole family,
they were not allowed to go nowhere"?
A. Yes. That's what I said, yes.
Q. And that, "They had them there always, and
they were with supervision"?
A. According to what she told me, yes.
Q. Didn't you say Frank Tyson was one of the
individuals involved in the handling of the Arvizo
family?
A. Correct.
Q. And did you say that Salas -- did you say
that ranch employees were required to go through
Frank Tyson with questions or problems regarding the
Arvizo family?
A. That is correct, yes.
Q. Did you also say that Tyson -- that you
believed Tyson would then, in turn, go through Mr.
Jackson?
MR. MESEREAU: Objection; leading. 4788

MR. AUCHINCLOSS: This is impeachment.
MR. MESEREAU: No foundation.
THE COURT: The objection is overruled.
You may answer.
Q. BY MR. AUCHINCLOSS: Did you say that Tyson would then, in turn, go through Mr. Jackson?
A. Correct, yes.
Q. Did you say that the Arvizo family was not being allowed to leave the Neverland Ranch even though the mother wished to leave with her children?
A. That's correct, yes.
Q. In the grand jury, when you testified, you were asked this question: You were asked whether or not you believed Janet Arvizo and her family was being kept against their will. You said, "Yes"; is that true?
A. Yes.
MR. MESEREAU: Objection. Foundation; leading.
MR. AUCHINCLOSS: Offered as impeachment.
THE COURT: Overruled. He said, "Yes."
Q. BY MR. AUCHINCLOSS: And is that a true statement?
THE COURT: He said, "Yes."
MR. AUCHINCLOSS: Okay.
Q. You said -- I believe when Mr. Mesereau was up here, you said that Mrs. Arvizo was never forcibly kept at Neverland; is that true? 4789

A. That is correct, yes.
Q. So no one ever used physical force on her?
A. No.
Q. You said that when you took her home, that she told you that she was -- you told Mr. Mesereau that she was upset with the people at Neverland Ranch?
MR. MESEREAU: Objection; misstates the evidence.
Q. BY MR. AUCHINCLOSS: Upset with Ronald -- I believe it was Dieter.
THE COURT: Do you want to rephrase the question?
MR. AUCHINCLOSS: Yeah.
Q. You told Mr. Mesereau that when you were taking Janet and the children home that first time, that she was upset with Dieter; is that correct?
A. That is correct, yes.
Q. Didn't you also previously state that she said she was upset with Frank as well, or no? You tell me.
A. No.
Q. Now, you also told Mr. Mesereau that the -- at that time, when she left Neverland Ranch the first time, she was not angry at Michael Jackson?
A. That is correct, yes.
Q. Okay. After she left Neverland that first time, did you ever talk to her about whether she was 4790

still angry at Michael Jackson?
A. No.
Q. Did you have much contact with her after
that first time?
A. No.
Q. Do you have any idea whether she is angry at
Michael Jackson today?
A. I have no idea.
Q. You mentioned that you allowed your daughter
Sandra to visit Mr. Jackson at Neverland.
A. That is correct, yes.
Q. When was that?
A. '91, '92, somewhere around there maybe.
Maybe later than that. I'm not quite sure.
Q. So early '90s?
A. I would say so, yes.
Q. Was it one occasion?
A. I believe it was about three times.
Q. Three times that she personally spent time
with Mr. Jackson?
A. Yes.
Q. Were all three of those occasions in '90,
'91, in that early -- early 1990s?
A. It was during the same time, yes.
Q. Did you ever allow your daughter to sleep
with Mr. Jackson?
A. She never slept over there.
Q. Okay. Would you ever allow your daughter to 4791

sleep with Mr. Jackson?
MR. MESEREAU: Objection. Calls for
speculation; leading; foundation.
THE COURT: It's argumentative; sustained.
Q. BY MR. AUCHINCLOSS: Knowing what you know
today, based upon all your time at Neverland, do you
believe this place is a healthy place, would be a
healthy place for your daughter to visit?
MR. MESEREAU: Objection. Opinion;
foundation; relevance.
MR. AUCHINCLOSS: This was offered as an
opinion as to --
THE COURT: The objection is sustained.
Q. BY MR. AUCHINCLOSS: Is it true to say that
the kids do get hurt at Neverland?
MR. MESEREAU: Objection. Relevance; beyond
the scope; leading.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Do kids ever get hurt
at Neverland?
MR. MESEREAU: Same objection.
THE COURT: Sustained.
MR. AUCHINCLOSS: Counsel asked the
question.
MR. MESEREAU: I never asked that question.
MR. AUCHINCLOSS: Talked about safety.
THE COURT: All right. Quit talking to each
other. 4792

MR. AUCHINCLOSS: Yes, sir.
Q. You said that some people invade Neverland or come in from the outside, correct?
A. Correct, yes.
Q. How far is Neverland away from the nearest town?
A. Six miles.
Q. How do these people get out there?
MR. MESEREAU: Objection; foundation.
Q. BY MR. AUCHINCLOSS: If you know.
THE COURT: The foundation is sustained.
Q. BY MR. AUCHINCLOSS: Okay. Do you know how these people get out there?
A. Yes, sir.
Q. How do they get out there?
A. Driving.
Q. Okay. So these people who visit -- who try to get into Neverland have a car?
A. Yes.
Q. Where is the car?
A. They park on the outside of the property.
Q. You also said that Janet complained about being separated from Michael, that Dieter was separating her from Michael. Yes?
A. Yes. That was her expression, yes.
Q. Didn't she say that she was -- didn't she complain that Dieter was separating her from Michael Jackson and her children? 4793

A. Not exactly what she said. She said that she was being separated from Michael.
Q. Okay. But didn't she reference her children when she was talking about that?
MR. MESEREAU: Objection; asked and answered.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: You say "not exactly." What do you mean?
A. She never mentioned the kids.
Q. Did she ever complain about being separated from her kids?
A. No, sir.
MR. MESEREAU: Objection; hearsay.
Q. BY MR. AUCHINCLOSS: When Janet was at Neverland --
THE COURT: Wait. There was an objection.
MR. AUCHINCLOSS: I'm sorry.
MR. MESEREAU: I'll withdraw the objection.
THE COURT: Go ahead, Counsel.
(Laughter.)
Q. BY MR. AUCHINCLOSS: When Janet was at Neverland, did she -- well, let me strike that. Do you know where Janet would spend most of her time while she was at Neverland?
A. She spent most of her time in the guesthouse.
Q. Do you know where she would take her meals? 4794

A. Many times she -- most of the time she took it in the room. There was times that she went in the kitchen.
Q. When Mr. Mesereau asked you if things kind of run themselves or keep running at Neverland when Michael is not there, who is it that makes the determination in general about how Neverland is run as a ranch? Who is it that makes the ultimate call?
A. Okay, for the place would be run, I mean, we have a staff. We have a ranch manager.
Q. Uh-huh.
A. And that's how we do it. I mean, that's how they used to do it. Just do it together.
Q. Who tells the ranch manager how he wants that place run?
A. On the major decisions, I guess it comes from L.A. also.
Q. Does Michael have anything to do with how he wants that place run?
A. I'm not sure if he has something to do with that, but he will tell you what he likes.
Q. When Mr. Jackson is on the property, do the employees act differently?
A. No. They shouldn't.
Q. There's no difference between when he's on the property or off the property?
A. No, because the place needs to run the same way whether he's there or not. 4795

Q. But isn't Neverland Ranch run exactly the way Michael Jackson wants it?
MR. MESEREAU: Objection. Leading and asked and answered.
MR. AUCHINCLOSS: Offered as impeachment.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Who is the person who ultimately makes the determination as to what happens at Neverland?
MR. MESEREAU: Objection. It's been asked and answered a couple of times.
THE COURT: Sustained.
MR. AUCHINCLOSS: Okay.
Q. Let me back off, then, and go to -- okay, so sometimes someone in Los Angeles makes the decision, right?
A. Uh-huh.
Q. Who tells the person in Los Angeles what they want?
MR. MESEREAU: Objection; foundation.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Have you ever seen guns on Neverland Ranch?
A. Not now, okay.
Q. Not now?
A. Before, at the beginning, yes.
Q. There were guns?
A. Yes. 4796

Q. Tell me about it.
A. That was at the beginning when Mr. Jackson bought the place. Security was carrying guns.
Q. Was there a period of time when guns were not kept -- not -- the security was not armed?
A. Yes, it came to the point that I guess Mr. Jackson didn't want any guns at the place, and nobody was carrying any weapons anymore.
Q. Did that ever change again?
A. No.
Q. Was there a time when a few people carried guns at Neverland?
A. Not that I was aware of.
Q. You said that when the Arvizo children were there, that Mr. Jackson was in constant meetings. You also said that he was constantly playing with the children.
A. That is correct, yes.
Q. So he was doing both of those things at the same time or --
A. Not at the same time. You know, when he was in meetings, he was in meetings. When he had some time free, he was playing with kids or he was by himself.
Q. Okay. Who was he having these constant meetings with? Who was there when he was having these constant meetings?
A. Hard to remember. Many people. 4797

Q. Okay. How about -- was Frank Tyson one of them?
A. Not really.
Q. But he did have meetings with Frank?
MR. MESEREAU: Objection; asked and answered.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: You also said that Mr. Jackson was -- you answered some questions about him taking prescriptions, prescription medication.
A. Correct.
Q. Do you know the difference between somebody who is drunk and somebody who is taking some medication?
MR. MESEREAU: Objection; vague.
THE COURT: Overruled.
Q. BY MR. AUCHINCLOSS: Go ahead.
A. No, I guess I don't have a way of describing that.
Q. Well, were there times when you were serving Mr. Jackson alcohol when he appeared to be drunk?
A. Yes.
Q. And do you know how often Mr. Jackson would have alcohol?
MR. MESEREAU: Objection; vague as to time.
MR. AUCHINCLOSS: I'll be specific.
Q. During this period in early 2003.
A. He was having a regular basis. 4798

Q. Daily?
A. I said regular basis.
Q. Could you smell alcohol on him when you saw him during these periods he appeared to be drunk?
A. No, I never got so close to him to be able to smell.
Q. You said that Mr. Jackson's policy was not to let kids in the wine cellar. Was this a --
A. That is correct, yes.
Q. Was that a written policy?
A. That was a policy, yes.
Q. Was that -- was it okay for kids to be in the wine cellar if he was there?
MR. MESEREAU: Objection; leading.
THE COURT: Overruled.
You may answer.
THE WITNESS: I believe when he was there, I guess it was okay for the kids, yes.
Q. BY MR. AUCHINCLOSS: Okay. And did you testify that there were times when he was in the wine cellar with children?
A. Yes.
MR. MESEREAU: Objection; misstates the evidence.
MR. AUCHINCLOSS: I'll rephrase it.
Q. Were there times when he was in the wine cellar with children?
A. Yes. 4799

Q. You have spoken to myself and various members of law enforcement in preparation for this case.
A. Correct.
Q. Has anyone ever told you to tell anything but the truth?
A. That is correct, nobody did.
Q. I'm sorry?
A. No.
MR. AUCHINCLOSS: Okay. Thank you. No further questions.

RECROSS-EXAMINATION
BY MR. MESEREAU:
Q. Just briefly. During the 20 years you worked at Neverland for Mr. Jackson, it was always his policy that children are not to be in the wine cellar, true?
MR. AUCHINCLOSS: Objection; foundation.
THE COURT: Overruled.
You may answer.
THE WITNESS: That is correct, yes.
Q. BY MR. MESEREAU: And Mr. Jackson sometimes would give people tours of his own home, correct?
A. That is correct.
MR. AUCHINCLOSS: Objection; beyond the scope.
THE COURT: Overruled. 4800

Q. BY MR. MESEREAU: And obviously, as the owner of the home, he can take people anywhere he wants in his home, right?
A. Correct.
Q. Now, when you were driving Janet to Los Angeles, she never asked you to call the police, did she?
A. No.
Q. When you arranged for the limousine to take the Arvizos to Los Angeles, they never asked you to call the police, did they?
A. No.
Q. In fact, she never asked you to call the police at any time, did she?
A. No, she didn't.
MR. MESEREAU: No further questions.
MR. AUCHINCLOSS: Nothing further.
THE COURT: All right. Thank you. You may step down.
MR. ZONEN: Your Honor, we'll call Jason Francia to the stand, please.
MR. MESEREAU: Your Honor, before we start, is there an instruction?
THE COURT: Yes.
BAILIFF NARRON: Step up to the chair. Remain standing and face the clerk.
MR. FRANCIA: The clerk.
THE COURT: Raise your right hand, please. 4801

1
2 JASON FRANCIA
3 Having been sworn, testified as follows:
4
5 THE WITNESS: I do.
6 THE CLERK: Please be seated. State and
7 spell your name for the record.
8 THE WITNESS: Jason Francia. And spell my
9 last name? F-r-a-n-c-i-a.
10 THE COURT: Mr. Francia, I'm going to ask you
11 to sit back with the bailiff just for a moment.
12 THE WITNESS: Okay.
13 THE COURT: (To the witness) If you'll just
14 have a seat while I instruct, please.
15 (To the jury) Ah, I can see you again.
16 (Laughter.)
17 THE COURT: Before -- I'm going to give you a
18 special instruction now.
19 One of the things I want to mention before I
20 give you these special instructions, though, is that
21 I know this daylight savings time is tough on us. I
22 was noticing a few drooping eyelids along here. If
23 you start, you know, feeling sleepy or something,
24 hold up your hand, and maybe we'll stand up and
25 stretch or something. It's really hard during these
26 time changes, and I know that, so I just want you to
27 know we can help you on that, too.
28 Okay. I'm now going to instruct you on two 4802

different types of evidence which you may hear. One relates to a prior uncharged sexual offenses. And two relates to a prior conduct -- to prior conduct leading to possible uncharged sexual offenses.
First, the instruction for the prior sexual offenses:
If you find that the defendant committed a prior sexual offense, you may, but are not required to infer that the defendant had a disposition to commit sexual offenses. If you find that the defendant had this disposition, you may, but are not required to infer that he was likely to commit and did commit the crime or crimes of which he is accused.
However, if you find, by a preponderance of the evidence, that the defendant committed a prior sexual offense, that is not sufficient, by itself, to prove beyond a reasonable doubt that he committed the charged crime.
If you determine an inference properly can be drawn from this evidence, this inference is simply one item for you to consider, along with all other evidence, in determining whether the defendant has been proved guilty beyond a reasonable doubt of the charged crime.
Unless you are otherwise instructed, you must not consider this evidence for any other purpose. 4803

Within the meaning of the preceding
instruction, the prosecution has the burden of
proving, by a preponderance of the evidence, that
the defendant committed sexual offenses other than
for which he is on trial. You must not consider
this evidence for any purpose unless you find, by a
preponderance of the evidence, that the defendant
committed sexual offenses.
If you find other crimes were committed by a
preponderance of the evidence, you are nevertheless
cautioned and reminded that before a defendant can
be found guilty of any crime charged in this trial,
the evidence of the whole must persuade you beyond a
reasonable doubt that the defendant is guilty of
that crime.
This is the second part of the evidence:
You will hear evidence that is being
introduced for the purpose of showing conduct of the
defendant leading to possible sexual offenses other
than that for which he is on trial. This evidence,
if believed, may not be considered by you to prove
that Mr. Jackson is a person of bad character or
that he has a disposition to commit crimes. It may
be considered by you only for the limited purpose to
determine if it tends to show a characteristic
method, plan or scheme in the commission of criminal
acts similar to the method, plan or scheme used in
the commission of the offense in this case, which 4804

would further tend to show the existence of the intent, which is a necessary element of the crime or a motive for the commission of the crime charged. For the limited purpose for which you may consider such evidence, you must weigh it in the same manner as you do all other evidence in this case. You are not permitted to consider such evidence for any other purpose.

"Preponderance of the evidence" means evidence that has more convincing force than that opposed to it. If the evidence is so evenly balanced that you are unable to find that the defendant -- that the evidence on either side of an issue preponderates, your finding on that issue must be against the party who had the burden of proving it. You should consider all of the evidence bearing upon every issue regardless of who produced it.

So, we are -- we have two possible types of evidence that you may hear, starting now. One relates to prior uncharged sexual offenses. That evidence, if the burden of proof - preponderance of the evidence is met - may be used to show a propensity to commit a similar crime.

The second type of evidence that you may hear is evidence that -- of conduct leading up to possible sexual offenses. And that may not be used to show a propensity to commit a crime. It can only be used to show the things that I mentioned to you. 4805

I won't go through them again.
Complicated, yes. I'll discuss it more with
you later. It's just an advantage to have it given
to you in advance of hearing the evidence.
MR. ZONEN: Was the witness sworn?
THE COURT: He was sworn. You may proceed.

DIRECT EXAMINATION
BY MR. ZONEN:
Q. Mr. Francia, good afternoon.
Sir, we've had to tell everybody so far that
you need to stay fairly close to the microphone
because it's hard to be heard in the far reaches of
the courtroom otherwise.
Tell me, how old are you at this time?
A. 24.
Q. Where do you work? What kind of work do you
do?
A. I sell auto parts right now. And I run a
mentoring program for kind of like the probation
department. Probation department refers kids to me,
to my organization, and we mentor them through them
not being truants and not committing crimes again.
Q. Let's start with the auto parts, and then we
can go to the other ones.
A. Okay.
Q. What do you do in the auto parts store?
A. I literally sell parts. If somebody comes 4806

to me with a car that's broken, and then they ask for advice, and I just sell them a starter or an alternator, or so on, so forth.
Q. You've been doing that for about how long?
A. I did this prior, so six -- probably a little less than a year.
Q. Okay. Let's go to the mentoring program. Who do you work for in the mentoring program?
A. Pete Taylor. It's through a church that I belong to, but yet it's still its kind of own identity. It's Foursquare Youth Programs. That's the official title.
Q. And the nature of the work, by "mentoring," what do you mean?
A. I'm the lead mentor. And the ultimate goal is, let me see, the probation department kind of says these kids need to be mentored. They needed to go through three programs. Sometimes community service or community service, mentoring, or some sort of jobs program or something else. And I'm one of their steps to get off of probation.
So what we try to do is match them up with a mentor, and that's my job, to try to match them up with mentors. And I take them out the first and third Saturdays of every month and we try -- just hang out with them and show them that there's something more to life than crime, or than ditching, or than partying, or than drugs, or than anything 4807

1 else. There's more to life. We show them there's
2 Frisbee golf. I've showed the guys how to change
3 the oil and change a tire.
4 My wife is helping. And she shows them how
5 to cook, make purses with the girls and --
6 Q. You've been doing this for how long?
7 A. I've been doing this, this exact job, for
8 about six months. This type of work for probably
9 since I was 18.
10 Q. Okay. When you were 18, did you start some
11 kind of an internship program dealing with this?
12 A. Yeah, I have started an internship with
13 Santa Maria Foursquare Church. Was -- and was
14 pretty much training to be -- to work with junior
15 high, to high school, to college-aged people. And I
16 just -- I -- I wanted to be trained in that, because
17 I have a passion for that, so I started that. I did
18 that for about two and a half years with Santa Maria
19 Foursquare Church.
20 Q. Did you ever work as a youth pastor?
21 A. Yeah. I did that in 2003 to 2004, from my
22 understanding. I can't really remember right now.
23 I'm kind of nervous, just to let you guys know.
24 Q. That's okay. What is a youth pastor?
25 A. Well, I was a youth pastor. That was, I
26 guess, my official title. But I worked with
27 13-year-olds to 25- or 26-year-olds. And pretty
28 much -- it's kind of like its own little church 4808

within a church. And you work with junior high and high schoolers. And then what I try to do is address the collegers in a different format. And then I've had the college students help me with the junior highers and high schoolers. So just talk about ethics, God, morals, and doing good.
Q. You've been doing htis consistently since age 18?
A. Yeah, pretty much.
Q. Tell us which church this is again, please.
A. The one I was a youth pastor, I did that through Oceano Foursquare. It was really known as Kings Way a long time ago. But pretty much Oceano Foursquare.
Q. Mr. Francia, you've been living in the Santa Maria area for how long?
A. In the Santa Maria area -- let me see. We moved up here in '88. Then I moved away when I graduated high school for like four months. And I'm still living here now.
Q. All right. You say "we" moved up here in '88. Who moved in '88?
A. My mom and I. It was just me and my mom.
Q. Based on what you tell us is your age, can I assume you were born in 1980?
A. Yes.
Q. Okay. What type of work did your mother do when you moved up here? 4809

A. She was working for Michael Jackson.
Q. All right. Is Michael Jackson in this courtroom today?
A. Yes.
Q. And could you --
A. He's right there.
Q. By telling us what he's --
A. He's the light-complected gentleman.
MR. ZONEN: Thank you.
Could the record so reflect, Your Honor?
THE COURT: Yes.
Q. BY MR. ZONEN: What type of work did your mother do for Michael Jackson?
A. She was a personal maid. At first she was just a maid. And from my understanding, my mom's just a hard worker and she moved up.
Q. Was she his maid prior to moving up here to Santa Maria?
A. I don't know if she was his full-on, like, personal maid and -- but she was, yeah. Yeah, she was his maid.
Q. From what period of time in Los Angeles was she working for Michael Jackson?
A. I think '86. But my mom tells me '85. I have no -- it's around '86, '85. I don't know.
Q. When did you first meet Mr. Jackson?
A. I was probably six. I think. Six or seven. And the reason I say that is just it was a long time 4810

ago.
Q. Did you ever have occasion to go to his residence in Los Angeles?
A. Yeah, the one in Encino, yeah. I went there probably a lot, like 10, 11, 12 times. I don't know. Often my mom -- it was just me and my mom, so a single mom and just me. She needed to babysit me pretty much, so we had nobody else; no dad, no brothers and sisters.
Q. Your father wasn't in the picture?
A. Correct.
Q. And there was no other kids; is that correct?
A. That is correct.
Q. During the time that you were living in Los Angeles before moving up to Santa Maria, from the time your mother began working for Mr. Jackson, tell us approximately how often you went to his residence.
A. I'm sorry, can you repeat that?
Q. Tell us approximately how often you went to his residence.
A. Throughout my whole life of my --
Q. While living in Los Angeles.
A. Oh.
Q. Before moving to Santa Maria.
A. I went to Encino. He owned a lot of stuff. But I -- there's an Encino, which is like the big 4811

mansion, and then there's the, like, apartment hideaway thing. I think I went to Encino, which is the big mansion, I don't know, about six, seven times.
Q. Did other members of the Jackson family reside at that location as well?
A. Yeah. Yeah.
Q. Can you tell us who lived there?
A. Mom and dad, I know that. I think they lived above the garages. I think. That's where I met them.
Q. Okay.
A. I think Janet lived there as well. By -- I don't know. Other than that, that's all I remember.
Q. We're talking about almost 20 years ago; is that correct?
A. Correct. Yeah. That -- yeah.
Q. Did you go to a different location where Michael Jackson lived in the Los Angeles area as well?
A. Yeah. In the Los Angeles area, yeah, like Hollywood.
Q. And can you describe that place for us?
A. Yeah. It was -- it didn't have much furniture. It was probably the tenth floor, because you could look over pretty much a lot of Hollywood and Beverly Hills. I think it was Beverly Hills. Didn't have a lot of furniture. Had a train set. 4812

Had a couple toys, telescope. Kitchen. But just not a lot of furniture. It was like a condo pretty much.
Q. And the reason that you would go to that location?
A. My mom had to clean everything. My mom was just a clean lady.
Q. Was she the only person cleaning his residence, as far as you knew?
A. No, there was other maids. But from my understanding, just my mom did a kickin' job. She just did a really good job at cleaning, a really good job at working just as a whole. She was just a good worker.
Q. And there was nowhere to leave you when she went off to clean?
A. Yeah. Sometimes she may -- she would leave me with my aunt, but my aunt had to go to work as well. Everybody in my family was workers.
Q. Okay.
A. And even -- even -- shoot, even I helped my aunt at times.
Q. Now, on the occasions when you would go to the -- what was it called? The hideout or hideaway?
A. Yeah, my mom called it "the hideout."
Q. Do you know why?
A. Probably because nobody knew about it. I don't think it was registered. 4813

MR. MESEREAU: Calls for speculation.
MR. ZONEN: Withdraw the question.
Q. Did Mr. Jackson ever mention the name of that place to you in any of his conversations to you?
A. I don't remember.
Q. All right. Was that something you enjoyed doing, going to either of those two places?
A. The mansion I did, just because of the arcade. I was young. It was fun. There was toys.
Q. Tell us about the arcade at the mansion.
A. Shoot. It had an old karate game. It just had a lot of video games in there, and it was fun for kids. It was -- I think he even had a laser tag set. I don't remember. But he had a lot of stuff, a lot of toys.
Q. There was a lot that you could do while you were there?
A. At the mansion, yeah.
Q. And you enjoyed doing that?
A. Yeah.
MR. MESEREAU: Objection; leading.
THE WITNESS: I'm sorry?
THE COURT: Overruled. Go ahead. Next question.
THE WITNESS: Okay.
Q. BY MR. ZONEN: At the other place, the place in Los Angeles, the hideaway, was that something you 4814

enjoyed doing?
A. Yes and no. There wasn't that many toys. My mom wouldn't let me go out anywhere else, and there wasn't that many toys. It was a condo, so it's not like I could play with the elevator all day long. There was not that many toys. There was just a train set. A train set gets boring. It just goes around in circles. And there wasn't that many toys.
Q. Did you ever spend the night at either of those two locations?
A. Encino -- the mansion I didn't, which is in Encino. And the hideaway we did, I believe, with my mom.
Q. All right. Do you know approximately how many occasions?
A. I don't recall. I don't remember.
Q. Were there beds or furniture there?
A. I don't believe so. I think there was an L-shaped couch like one of those that you put in a corner. There was a chair. I know that, because -- stuff. There wasn't that much furniture.
Q. How old were you when you moved to Santa Maria?
A. '88 or '89. Eight years old. Yeah. Because I stopped playing baseball. Played baseball for a little.
Q. When you moved to the Santa Maria area, what job did your mother have? 4815

A. She was -- I believe her title, from what she told me, was Michael Jackson's personal maid, and she had, like, all the keys. She was the best maid he had, I guess.
Q. Did you ever go to Neverland?
A. Yeah. Yeah, I did.
Q. Tell us approximately how old you were during that period of time.
A. I think when it first opened, it was just -- I went there. They probably had a party there. How old was I? Probably around nine. Eight.
Q. Approximately how many times do you think you went to Neverland?
A. Five, four. Five or four.
Q. Always with your mother?
A. Yeah. There was no other way to get up there, yeah.
Q. Did you ever spend the night at Neverland?
A. Yes. With -- yeah, I remember distinctly, because I think I was hearing bats or something, on the ranch, or something, and I couldn't sleep, so -- but I was sleeping with my mom, like in the same room, in the same area with my mom, and, yeah. I couldn't sleep.
Q. Were you ever in Michael Jackson's bedroom?
A. Yes.
Q. On how many occasions?
A. Two, I think. Two. I'm pretty sure. 4816

1 Once -- one I know for sure, because we were
2 all laying in the bed watching T.V.
3 Q. And who is "we were all"?
4 A. Michael and a bunch of other kids.
5 Q. Okay. Do you know how many?
6 A. I don't. Seven. Six. But I don't -- I
7 don't.
8 Q. Do you know any of the names?
9 A. I'm really bad at names. Even to this day.
10 I called you "Mark" earlier.
11 Q. That's not me.
12 A. Yeah, I know.
13 Q. Do you know how old you were when your
14 mother stopped her employment at Neverland?
15 A. I'm thinking 11, because I was -- I remember
16 hearing about -- I was playing in the pool, and she
17 told me, "I quit."
18 Q. You were playing in the pool where?
19 A. At a friend's house, and when I was 11, I
20 was friends with him.
21 Q. I'd like to go back to, if I could, please,
22 the period of time in Los Angeles prior to moving up
23 to Santa Maria.
24 Was there ever an occasion that you were
25 with Michael Jackson where something happened that
26 made you feel uncomfortable?
27 A. Yes.
28 Q. Did that happen more than once? 4817

A. Yeah.
Q. Do you have a recollection of these events?
A. Yeah.
Q. Let's begin with the first one. What happened?
A. Okay. Well, the first time that I felt uncomfortable with him was in the hideout, which is the place in Encino -- not in Encino, I'm sorry. In Hollywood. And -- shoot. I was seven and -- I don't know, at seven years old, I don't think -- okay. I may have not felt uncomfortable, but then now I think about it, that shouldn't have been done. But I didn't feel uncomfortable.
Q. What happened?
A. I was sitting on his lap, and I was young, and I was small. I'm still thin. I was even thinner then. Sitting on his lap, watching T.V., which that's normal enough in itself. And then we -- I was kind of facing the T.V., and he was facing the T.V. as well, so my back was to his chest. And it was -- there was just one chair, and there wasn't much furniture in that hideout place. And I was just sitting there watching T.V., and so was he. I think we were watching cartoons. And he just started tickling me, which, cool, shoot, I was a tickle guy. I tickled him back, but still kind of from the back, kind of reaching around. And then we went to the floor, I think, but 4818

I can't completely remember right now. But we somehow got on the floor, tickling still, because I'm doing what -- these little kid things, you know, when you shimmy back and forth.
And then I'm tickling and he's tickling, and I'm tickling and he's tickling, and it eventually moved down to -- to -- to my little private region when you're a little kid. I don't know if you want me to call it specifically something, but around my crotch area. And I didn't -- you know, you're seven. I didn't think it was wrong. Well, I did. Because he's tickling, but I'm laughing, and I'm tickling him back, trying to get him to stop, but then I'm tickling too much. I'm laughing too much. And eventually it stopped. I don't know how.
Q. Did he actually make contact with your genital area?
A. Not skin to skin, but, yeah. Yeah, he was on my clothes, yeah.
Q. Do you know for approximately how long?
A. Distinctly I can't remember. It was a while, though.
Q. By a little while, can you give us a sense of it?
A. More than three minutes, less than 20. Less than ten minutes, I think.
Q. Okay.
A. But a while. It was -- it was tickling. It 4819

didn't end soon. It didn't end fast.
Q. But the amount of time that his hand was
actually in the region of your genitalia?
A. I cannot remember.
Q. Okay. And you commented that this was not
skin to skin touching; in other words, his hand
directly on either your penis or testicles.
Is that --
MR. MESEREAU: Objection; asked and
answered.
THE COURT: Overruled.
You may answer.
Q. BY MR. ZONEN: That it was not directly on
your genitalia; is that correct?
A. Correct. It wasn't -- he didn't touch me.
He was touching on top of the skin, but -- but
not -- on top of my shorts, but still --
Q. Do you remember what you were wearing at the
time?
A. Probably shorts. I don't remember
specifically. I think those orange shorts that my
mom made me, because, again, we were poor, but my
mom made me clothes. And I was always wearing
shorts, always wearing shorts.
Q. And she had orange shorts that she had made
for you?
A. Yeah, there was orange shorts that she made
for me. And then she -- yeah. 4820

Q. Were they shorts you wore a lot?
A. Probably, yeah. Because -- yeah.
Q. Did -- as you think back now, today, of course we're talking about quite some number of years ago, do you remember how you felt at the time this happened, if that was at all strange for you?
A. You know, I don't. It was -- I don't remember. At seven, it probably -- well, I probably did think it was weird, but not super weird. Just because you're tickling, and it's -- but I guess that would be weird. My fault.
Q. Was there another instance?
A. Yeah.
Q. Was that also at the hideout?
A. Yeah.
Q. Tell us what happened, please.
A. I was watching cartoons again, and probably in the same room, because I think there was only one room in that whole place.
And we somehow -- I was somehow -- there was a sleeping bag involved. I don't know -- I think I was on top of it. And I was watching T.V., laying down on the ground, and Michael was pretty much behind me, like spooning me. I don't know how we got there. I was like eight, eight and a half. It was a little while after. And again with the tickling. But this time it wasn't as long, and I was -- well, I'm sorry. It was longer, but I wasn't 4821

laughing as much, I guess.
Q. You were in a sleeping bag, or on a sleeping bag?
A. On, I think.
Q. Okay.
A. On, not in.
Q. All right. Do you remember -- you said this was in the hideout?
A. Yes.
Q. Were there a number of rooms in the hideout?
A. I think there was only one, I think. Yeah. I think there was only one, if I could -- hold on. Let me -- there was a rest room. There was a kitchen. There was a big main room. And there was a room off to the left, if you're looking out the window. Yeah, I think there was only one.
Q. All right. Where was your mother during this time?
A. Probably cleaning. She was always cleaning.
Q. But --
A. To this day she cleans.
Q. Do you know in what room at that point?
A. No, I don't. I don't know.
Q. Was she in the room with you at the time?
A. No, she wasn't, or else she probably would have kicked my butt or something.
Q. In the private -- in the prior event that you described, was your mother in the room at that 4822

time?
A. No, she wasn't in the room.
Q. But if you were at the hideout, then she was there; is that a correct statement?
A. Correct. Or sometimes she may have run down to get something to eat. Remembering now, there was a couple times that Michael actually asked her to get chips, or get something, or get something from downstairs, or maybe even from the lobby. That's what I'm thinking.
Q. What was downstairs? Was that a --
A. I think there was probably like a restaurant or something downstairs, but I don't really -- I have no clue.
Q. But the apartment that you're describing is a single floor? There's no upstairs or downstairs to it?
A. Oh, yeah.
Q. And this is a large building in Los Angeles?
A. Yeah.
Q. All right. When do you think was the last time that you had been to that building?
A. When was the last time I was there?
Q. Yeah.
A. I'm thinking nine, eight.
Q. Age eight or age nine?
A. Yeah.
Q. Even after you moved up to Santa Maria? 4823

A. I believe so. Just because my mom had no one to leave me up in Santa Maria with. We -- new town.
Q. Let me go back to the second event. In the second event we're talking about, you were in a sleeping bag?
A. Yes.
Q. Was there a bed in that room?
A. No.
Q. Was that Mr. Jackson's bedroom; do you know?
A. I don't know.
Q. Was there a television in that room?
A. Yes.
Q. Was there more than one T.V. in that apartment, to your knowledge?
A. I don't think so.
Q. Were you watching television at that time?
A. Yeah.
Q. Do you remember if it was late at night or midday? Do you have any way of knowing?
A. It may have been midday, but I don't know.
Q. Can you describe the building for us in general, in terms of how it was laid out?
A. Almost like a typical apartment or a condo. You walk in the front door, there's a big living room. There's -- there's a telescope in there. There's a bunch of toys. There's a couch. And then there's the kitchen. 4824

Q. Okay. The room that has the couch, is that the room where the sleeping bag was?
A. No, the room that has the couch didn't have any furniture but the chair, I think. I'm pretty sure.
Q. And now the sleeping bag itself, on the floor?
A. Yes.
Q. Was it a normal-sized sleeping bag?
A. I believe so. I would think so.
Q. You used the expression "spooning." What does that mean?
A. Something that you do with your wife. Something that you do with a girlfriend. Spooning. Like --
Q. Describe the position for us, if you would.
A. Wow. When somebody is holding you and you're laying on your side and they're holding you from behind.
Q. Okay.
A. Thanks.
Q. Was that the position that you were in with Mr. Jackson?
A. Yeah.
Q. Were you in front or behind?
A. I was in front.
Q. Do you remember where his arms were?
A. I couldn't specifically tell you. 4825

Q. Was the tickling done again?
A. Yeah.
Q. Was this something that you and Mr. Jackson did frequently, tickling?
A. Whenever something happened.
Q. Okay. On this occasion, when he was tickling you, what happened?
A. We were tickling -- oh, he was tickling me at first, and I was just watching T.V. Probably cartoons again. And he was just tickling me from behind, and in my genital area. And I was laughing, and I was trying to tickle him back. And -- go ahead.
Q. His hands made contact with your genitalia?
A. From the top of the clothes.
Q. Do you remember what you were wearing on that occasion?
A. Probably shorts again.
Q. Simply because you do?
A. Simply because it's hot in L.A., yeah, and I always wore shorts. I think every picture I have -- well, not "every," but there was a lot of pictures of me wearing shorts when I was younger.
Q. Are you mindful of his hand reaching your crotch at the time; you were thinking about that at the time?
MR. MESEREAU: Objection; leading.
THE WITNESS: I don't even know what he 4826

1 asked me.
2 THE COURT: Just a moment.
3 THE WITNESS: I don't understand, yeah.
4 MR. ZONEN: Thank you.
5 Q. Was it -- were you aware of it happening
6 while it was happening?
7 A. Yes.
8 Q. Okay.
9 A. Yes.
10 Q. And how long was his hand there?
11 A. Two cartoons' worth. A cartoon and a half
12 worth.
13 Q. And you were watching cartoons on television
14 at the time?
15 A. Yeah.
16 Q. How long is a cartoon? It's been a while
17 since I've seen one.
18 A. It's been a while for me, too.
19 Does anybody here watch cartoons?
20 Q. Tell us the best of your recollection. We
21 can't let them be witnesses at the moment.
22 A. A "Woody Woodpecker" I guess would last
23 four, five minutes.
24 Q. Okay.
25 A. Five, six minutes.
26 Q. So the contact in the area of your genitalia
27 was at least four or five minutes?
28 A. Yeah. 4827

Q. Did it feel strange to you at the time?
A. Yes and no. “No” because -- “no” because it’s all fun, and it’s supposed to be innocent, and you’re a little kid, and you’re having fun, and -- you’re a little kid.
Q. Okay.
A. And “yes” it’s not right.
Q. Did Mr. Jackson ever give you money?
A. Yeah.
Q. On how many occasions did he give you money?
A. Pretty much at every tickle thing there was money.
Q. Explain that, what you mean by that, “at every tickle thing there was money.” Explain what you mean, please.
A. Every time I was being tickled, there was always some sort of money exchanged. Not exchanged. There was money given. It was just that.
Q. Before, after, during?
A. After. And it was kind of a, “Don’t tell your mom, about the money.”
Q. Well, what would he give you?
A. A hundred-dollar bill.
Q. A hundred-dollar bill?
A. Yeah.
Q. Did he do this on more than one occasion?
A. Yeah, because I had a lot of money. Well, I didn’t have a lot of money. My mom took the money, 4828

because she would find out that I got hundred-dollar bills, and then she'd get mad at me for taking some stranger's -- well, not stranger's, but somebody's money.
Q. Do you remember if, in fact, you got the money on both of those two occasions?
A. Yeah. Yeah, I did.
Q. Were there ever any other occasions, whether in Los Angeles or any other occasion or any other location where something happened that made you feel uncomfortable?
A. Yeah.
Q. And where was that?
A. At the ranch.
Q. Do you remember how old you were?
A. Ten and a half, ten. I was older.
Q. And you have a recollection of this event?
A. Yeah.
Q. There's water there also, if you need anything.
A. Oh, I was wondering. I thought it was coffee. I was hoping it wasn't.
Q. No, it's water. And feel free to take some if you need some.
A. Okay.
Q. You think you were about ten or ten and a half?
A. Yeah. 4829

Q. It was prior to the time that your mother
quit her job there?
A. Yeah.
Q. Did you ever go back to Neverland after your
mother quit her job there?
A. No.
Q. Do you remember where this event took place,
where at Neverland?
A. What, the event?
Q. That made you feel uncomfortable.
A. Yeah. It was in the arcade room. There was
a loft area.
Q. Describe what the arcade is.
A. A place where there's a bunch of video
games, and there was a pool table, and I think there
was a fireplace. I think that was up in the loft.
I think. That was a long time ago. But, yeah, it's
Street Fighter, the original one, in there, and
pool tables, and a couple of other video games.
Q. On what part of the arcade were you at the
time this happened?
A. I was in the loft.
Q. Upstairs?
A. Yeah.
Q. Was anybody else up there with you?
A. No.
Q. Was Mr. Jackson there?
A. Yeah. 4830

Q. By "other people," I mean other people than you and Mr. Jackson.
A. It was just him and I.
Q. Do you recall approximately what time of day or evening it was?
A. No. Nighttime.
Q. Was your mother working that day?
A. Yes.
Q. Were there ever occasions when you were at Neverland and your mother wasn't working?
A. Yeah, when we'd have parties and stuff, but I think she'd still work, because she'd always walk around cleaning even though she wasn't dressed for it.
Q. Were there ever occasions when you were at Neverland and your mother was not there?
A. No, she was always there.
Q. On this occasion, was your mother in the arcade?
A. No.
Q. Was she working that day?
A. Probably.
Q. Do you remember where her assignment would have taken her? Did she go to specific locations?
A. In the ranch?
Q. Yes.
A. At the ranch area. She was cleaning everything. 4831

Q. Okay.
A. She wasn't in the arcade.
Q. Okay. And what happened when you were in the arcade.
A. In the loft?
Q. Yes, please.
A. I think I was playing Sega Genesis.
Q. Tell us what that is, please.
A. It's -- it's a video game. I was just a video-game-playing kid.
Q. Okay.
A. There was a video game. There was a T.V. up there, I believe. It was a really big T.V., and I was playing, and then he started tickling me, and I think there was -- there was a couch up there, because we somehow managed to end up on the couch. It took a lot of counseling to get over, just to let you know.
MR. MESEREAU: Objection. Move to strike; nonresponsive.
THE WITNESS: I'm sorry.
Q. BY MR. ZONEN: Let's see if we can restrict our answers just to the questions, if we can. I'll ask you some questions about that later. You were on the couch. Do you know if both of you were sitting on the couch?
A. Hold on. We were laying down on the couch. 4832

Q. Okay. How were you laying down? How were you positioned relative to Mr. Jackson?
A. Probably about -- no, it was in the spooning position again.
Q. Okay. Was he behind you or in front of you?
A. Behind me.
Q. And then what happened?
A. We were tickling -- well, he was tickling and I was laughing. And -- and -- and we -- it was -- he was -- he was tickling me in the....
So much happening right now. Can we take a break or something?
MR. ZONEN: Can we take just a moment, Your Honor?
THE COURT: Okay. Sure.
MR. ZONEN: Just a break for a moment or two?
Q. Okay.
A. All right.
Q. You were on the couch, and you said in the spooning position?
A. Yeah.
Q. Tell us what happened, please, the best you can.
A. He was tickling me. And then I was wearing shorts again, I'm pretty sure, and, yeah, because he had to have reached under. We were tickling; I was laughing. He reached on my leg, and I'm still 4833

laughing, and he's tickling. And then he reached up and -- and to my privates, yeah.
Q. Did he actually touch your --
A. Yeah.
Q. Touch you?
A. Yeah.
Q. Did he touch your penis or your testicles?
A. I think option two, yeah.
Q. Your testicles?
A. Yeah, that one.
Q. For what period of time?
A. I don't remember. Three minutes, two minutes.
Q. Was it tickling?
A. Probably, because I think I was still laughing. But, you know, it may have been the other hand.
Q. Were you mindful of it at the time? Were you aware at the time he was doing it?
A. Yes.
Q. What were you thinking at the time? You're now ten and a half years old. What were you thinking?
A. "I should probably go."
Q. How did it end; do you know?
A. Either my mom -- I don't -- I don't remember how it ended.
Q. Do you have a sense of it? 4834

A. Huh-uh.
Q. Do you remember getting up?
A. No.
Q. Did you think about it afterward?
A. Yeah. No, well, not instantly right afterwards. You're ten. You don't want to think about that stuff.
Q. Was Mr. Jackson still giving you money at that time?
A. That time I didn't get any money.
Q. Did you tell anybody about that right afterward?
A. No.
Q. Did you tell your mother, ever?
A. No. I don't even think to this day she knows.
Q. All right. At some point in time this became known to somebody; is that right?
A. Yeah.
Q. Who did you tell? Who was the first person you told about it?
A. Probably God. But --
Q. Let's go to number two, then. Who was the second person?
MR. MESEREAU: Move to strike that comment, Your Honor. Nonresponsive.
THE COURT: Well, it's responsive. Overruled. Go ahead. 4835

Q. BY MR. ZONEN: Who else did you --
A. Who did I tell? I forgot their names, but there was two detectives. Yeah, I told those two guys.
Q. Before or after your mother had quit her position at Neverland?
A. She had already quit.
Q. All right. At some point in time police came to you and said they wanted to talk to you; is that right?
MR. MESEREAU: Objection; leading.
THE WITNESS: This is going to be hard for me to get through. Sorry.
THE COURT: Okay. The objection is overruled.
You may answer.
Q. BY MR. ZONEN: Go ahead.
A. Yeah, they wanted to come and talk to me. I was 13. I was in eighth grade, I think. Yeah. I -- yeah.
Q. Around 1993?
A. Yeah. It was '93, I think, yeah.
Q. Did you know in advance that they wanted to speak with you?
A. No. Not until the big day that this crappiness started.
Q. Okay. At some point in time, they showed up? 4836

A. Yeah. They showed up probably around 4:00, because I had judo practice at, like, 6:00.
Q. So it was about -- I'm sorry, you had judo practice afterward?
A. Yeah, I had to go to judo practice right after, and I don't think I went because I was crying.
Q. So you think it was about four o'clock in the afternoon?
A. I think they came around four o'clock.
Q. Do you remember how many people came?
A. I think two. But I don't remember.
Q. Was your mother present during the course of that interview?
A. No.
Q. Do you know if that interview was tape-recorded?
A. Yeah, it was tape-recorded because I listened to the tapes.
Q. You listened to it recently?
A. Yeah.
Q. Do you know if a transcription had ever been prepared of that interview?
A. A trans -- yeah, it has been.
Q. And did you, in fact, review that transcription as well?
A. Yeah. While I was reading it, yeah.
Q. The people who were present during the 4837

course of that interview, you and how many
detectives?
A. Two. Two detectives. Me and two other
guys.
Q. They were both men?
A. Yeah.
Q. Had you ever -- did you know them prior to
that time?
A. No. No.
Q. Have you seen either one of them since?
A. Yeah, I just bumped into one outside. We
were talking a while. I was waiting for -- to be
called up here.
Q. Okay. Just today, right before you
testified you saw one of them?
A. Yeah.
Q. Did you recognize him?
A. No, I didn't. He said, "You probably don't
remember me." And I said, "No." And he told me who
he was. And then I was like, "Hey, that was you."
Q. Do you know where they were from, the
agency?
A. The police?
Q. Yes.
A. No.
Q. At the time that you were having that
conversation?
A. No. 4838

Q. I don't mean now, but at the time you had the conversation with them.
A. No, I just knew they were police officers.
Q. Did you know they were tape-recording it at the time?
A. Yeah, because he showed me and -- he showed me the tape-recording. And the tape-recorder was sitting right in front.
Q. Did you know what it was all about at the time you sat down at the table with them?
A. I knew it was about Michael Jackson just because it was on T.V. all the time, and -- yeah.
Q. So there was already something going on in the news; is that correct?
A. Yeah.
Q. Okay. Did your mother know that you were entering an interview with them?
A. Yes. She had to have let me go.
Q. All right.
A. My mom knew where I was at all times.
Q. Do you remember where you were for this interview?
A. Yeah. At the juvenile hall, or the sheriff's department.
Q. So it was over in the -- in where, in Santa Maria?
A. Yeah, in Santa Maria. Well, in Orcutt, but -- yeah, in the sheriff's department. 4839

Q. Do you recall how long that conversation was?
A. I don't recall. An hour, hour and a half.
Q. All right. And that's consistent with your having reviewed that tape-recording as well?
A. Right. Right.
Q. And your mother did know that you were going to be there; is that right?
A. Yes.
Q. Was she at the building at the time you were there?
A. I don't think so. I think she was in our little studio apartment still.
Q. Okay. In the course of that interview, did you discuss with them what had happened to you?
A. Let me drink some water.
Q. Go ahead.
A. Pump?
Q. It's confusing. There's a button on the top.
A. I'm not a coffee drinker, sorry. It's a coffee thing, I think.
I'm sorry. What was the question again?
Q. Did you discuss with the detectives what had happened to you with Mr. Jackson?
A. Yes. Eventually. But at first I didn't want to. I was fighting it with everything that I could. 4840

Q. Why?
A. Because it's embarrassing. It's embarrassing now, and I'm 24 years old.
Q. Okay. Was it harder then, at age 13?
A. Yeah.
MR. MESEREAU: Objection. Relevance; move to strike; leading.
THE COURT: Sustained; stricken.
Q. BY MR. ZONEN: Ultimately --
A. It was difficult for me.
Q. -- did you disclose to them the information that you gave us today?
A. Yes.
Q. At some point in time, did you have an interview or were you represented by a private lawyer?
A. At some point, yeah, in time I was.
Q. Do you remember the name of that lawyer?
A. Yeah, Terry -- Terry Cannon. And Kris Kallman.
Q. There were two lawyers who represented you?
A. Yeah.
Q. Do you know if -- was this after this interview?
A. Yes, it was after this interview. It was like two months after this interview, I think.
Q. Were you ever called for a deposition?
A. I was never called for a deposition. 4841

Q. Did you ever know a young man by the name of Jordan Chandler, or Jordie Chandler?
MR. MESEREAU: Objection; relevance.
THE WITNESS: Did I --
MR. MESEREAU: Relevance; foundation; move to strike.
THE COURT: Overruled.
You may answer.
THE WITNESS: Did I ever meet him?
Q. BY MR. ZONEN: Yes.
A. I probably did, but I -- I don't remember names. I'm really bad with names. And I'm not --
Q. Do you know if you were being prepared at any time to give a deposition in a case involving Mr. Chandler?
A. No. What -- prepared by -- I don't know what you mean by "prepared."
Q. Did your attorneys ever talk to you about the possibility of your going in and giving a deposition?
A. No. I don't think so. I don't remember.
Q. At some point in time, was there a settlement of some kind of a case involving you and Mr. Jackson? We're not going to get into the specifics of the amounts, but was there a settlement?
A. Yes.
Q. Do you know if a lawsuit was ever actually

1 filed?
2 A. No. I don't think so, no. Because there
3 was a settlement, so there was no lawsuit.
4 Q. All right. Did you have anything to do with
5 it? In other words, did you say anything one way or
6 the other about asking to have money?
7 A. No.
8 Q. But were you consulted in any way about what
9 was going to happen on that?
10 A. No.
11 Q. Okay. Was -- did you go into counseling at
12 this time?
13 A. Yeah.
14 Q. And --
15 MR. MESEREAU: Objection; relevance.
16 THE WITNESS: Oh, I'm sorry.
17 MR. ZONEN: I think it's relevant.
18 MR. MESEREAU: And leading.
19 THE COURT: I'll allow the question. The
20 question and answer was, "Yes."
21 Q. BY MR. ZONEN: For what period of time did
22 you stay in counseling?
23 MR. MESEREAU: Objection. Relevance; 352.
24 MR. ZONEN: I believe it's appropriate under
25 People vs. Bledsoe and Shirley.
26 THE COURT: Go ahead. I'll allow the
27 question.
28 Q. BY MR. ZONEN: For what period of time did 4843

you stay in counseling?
A. Shoot, like a week after the sheriffs interviewing me, or police, or whoever they were. And --
Q. That's when it started?
A. Till I was 18, yeah.
Q. Till you were 18?
A. Yeah.
Q. Mr. Francia, recently have you been under surveillance?
A. Yeah.
MR. MESEREAU: Objection. Relevance; 352.
THE WITNESS: We might be going there. I don't know.
THE COURT: I'm not sure what the relevance is. Do you want to approach?
MR. ZONEN: Yes, I think so.
(Discussion held off the record at sidebar.)
THE COURT: Looks like it's time for our afternoon break.
(Recess taken.)
THE COURT: For the record, the objection was sustained.
Q. BY MR. ZONEN: Mr. Francia, you stated earlier, you gave the statement, "When all this," and I think you used the word "crappiness began." What were you referring to?
A. I guess coming out with it. Just because I 4844

had hidden it, and it was stowed away in a far off
place. And that's what I meant. It was time for it
to come out.
Q. Were you aware of your mother going on
television at some time back in 1993 or '94?
A. I knew about it when she was finally on
T.V., yeah. I -- she told me --
MR. MESEREAU: Objection; hearsay.
THE COURT: Sustained.
Q. BY MR. ZONEN: Were you consulted about that
prior to --
THE COURT: They can't hear.
Who didn't hear back there? Counsel here?
MR. ZONEN: Is it on or off? I can't tell.
Is it on? It's on.
Q. Were you consulted by anybody prior to your
mother going on television?
A. Was I?
Q. Yes.
A. No.
Q. Okay. Did it cause you problems when that
happened?
A. Yeah.
Q. And in what way?
MR. MESEREAU: Objection; relevance.
THE WITNESS: It made --
THE COURT: Sustained.
THE WITNESS: Okay. 4845

MR. ZONEN: I have no further questions.
THE WITNESS: Can I get a jacket? It's cold over here. I think I heard them say it's cold, too. Thanks.

CROSS-EXAMINATION
BY MR. MESEREAU:
Q. Good afternoon.
A. Hi.
Q. My name is Tom Mesereau, and I speak for Michael Jackson.
A. Okay.
Q. If anything I ask you is not clear, please don't answer. Just say, "I don't understand it," okay? And I'll try to rephrase it.
If you ever want to take a break, just say so, and if Judge Melville lets you, you can. But I don't want you to answer anything I ask you unless it's very clear to you what I'm asking you and you feel like you can answer it, okay?
A. Sounds good.
Q. So you know who I am, I'm on his side, okay?
A. Okay.
Q. We've never met before, right?
A. Correct.
Q. And we've never spoken before, right?
A. I don't think so.
Q. Okay. Now, the prosecutor mentioned the 4846

1 fact that your mother, at one point many years ago,
2 went on the television show Hard Copy, right?
3 A. Correct.
4 Q. And at some point you learned about that,
5 right?
6 A. At some point I learned about what?
7 Q. Your mom going on the television show Hard
8 Copy?
9 A. At some point I learned about it, yes.
10 Q. Okay. And at some point you learned that
11 she took $20,000 to go on the T.V. show Hard Copy,
12 correct?
13 A. No.
14 Q. You don't know anything about that?
15 A. I do not.
16 Q. You've never heard that to date?
17 A. I have heard of it today.
18 Q. When did you first learn that your mother
19 have gone on the T.V. show Hard Copy and accepted
20 $20,000?
21 A. Right now. Well, it may actually -- two
22 days ago, I think.
23 Q. You never knew it until two days ago?
24 A. That is correct. The reason....
25 Q. Now, at some point, your mother met with
26 someone from The National Enquirer, right?
27 A. I don't know.
28 Q. You don't know anything about that? 4847

A. No.
Q. When did you first learn that your mom had gone on the T.V. show Hard Copy to talk about Mr. Jackson?
A. When did I first learn --
Q. Yes.
A. -- that my mom went on T.V?
Q. Yes.
A. On Hard Copy?
Q. Yes.
A. I think it was when I saw it on T.V.
Q. And that would have been when?
A. I have no clue.
Q. Do you have any idea what year?
A. No.
Q. Does more than ten years ago sound right to you?
A. If you told me five years ago, I'd say okay. This whole past -- all these incidents, yeah.
Q. Now, your mother at some point retained lawyers to represent you and she, correct?
A. I don't know if she got them. I don't think she did.
Q. Well, you were a -- really a little boy, right, when lawyers were suddenly with you?
A. I'm sorry?
Q. Weren't you very little, very young, when lawyers started appearing? 4848

A. I was young when all of this stuff happened, yes.
Q. How old do you think you were when you first met a lawyer involving Mr. Jackson?
A. Were those two detectives lawyers?
Q. No. No, they're with the sheriff's --
A. They're just detectives?
Q. And you met them recently, haven't you?
A. No, I just met one of them right outside.
Q. Okay. One of the two detectives that first talked to you?
A. Yeah. We were talking about life.
Q. Okay. Now, when you first met them, you knew they were with law enforcement, right?
A. When I first met them?
Q. Yes.
A. I don't really know who they -- no, I don't -- I didn't think -- yes. I don't know. I didn't understand the question I guess.
Q. Okay. Just tell me if you don't understand a question.
A. Okay.
Q. You learned at some point your mother went on Hard Copy, correct?
A. I learned at some point that my mom went on Hard Copy.
Q. Yes.
A. Okay. 4849

Q. And you saw it on T.V., right?
A. Right.
Q. And at some point you learned that your mother accepted $20,000 to be on Hard Copy, correct?
A. You already asked that.
MR. ZONEN: And I so object as asked and answered.
THE COURT: Sustained.
Q. BY MR. MESEREAU: When did you first, if you remember, talk to a lawyer about anything Mr. Jackson allegedly did?
A. What he -- when did I tell somebody or tell the lawyer? Repeat that.
Q. Yeah, when did you first meet a lawyer to talk about your claim regarding Mr. Jackson's behavior?
A. I don't remember.
Q. Do you know approximately when it was?
A. I think the only -- I don't think I ever told Terry or Kris if he molested me or not.
Q. Okay. Now, Terry is who?
A. Terry?
Q. Terry is the lawyer?
A. Terry is a lawyer.
Q. That's Terry Cannon, correct?
A. Correct.
Q. And Kris is who?
A. Kris -- I forgot his last name. He's a 4850

1 lawyer.
2 Q. You mentioned him in response to the
3 prosecutor's questions. Didn't you say Kris was a
4 lawyer?
5 A. I don't remember the prosecutor's questions.
6 Q. Do you have a lawyer named Kris?
7 A. Right now? No.
8 Q. Have you ever had a lawyer named Kris?
9 A. I believe so.
10 Q. And do you know Kris's last name?
11 A. That's what I just said. I don't remember.
12 Q. Okay. Now, did I hear you just say you
13 never told either lawyer that you had been molested?
14 A. I don't -- I'm sorry?
15 Q. Did I hear you just say that you never told
16 either lawyer you'd been molested?
17 A. I said I didn't know. That's what I said.
18 Q. You told the lawyers you didn't know?
19 A. No, I told you I didn't know.
20 Q. You told me you didn't know whether or not
21 you had told any lawyer you'd been molested, right?
22 A. Not any lawyer.
23 Q. Okay. I'm not understanding you.
24 A. I'm not understanding you either.
25 Q. Let me rephrase the question.
26 A. Okay.
27 Q. Did you ever tell Attorney Terry Cannon
28 you'd been molested? 4851

A. Yes.
Q. And did you ever tell Attorney Kris you'd been molested?
A. Yes.
Q. Okay. Approximately when did you do that?
A. I don't remember. I was young.
Q. Do you know approximately what year it would have been?
A. I'd go with '94 or '93 or '95.
Q. And how old were you in '93?
A. I was 13. Well, yeah. My birthday's May 30th, so --
Q. How old were you when you claim Mr. Jackson first tickled you improperly?
A. Seven and a half the first time.
MR. ZONEN: I'm going to object as vague when we're referring to the claim or the tickling.
MR. MESEREAU: I think I was -- I'll rephrase it if the Court wants me to. I think I was clear.
THE COURT: The objection's overruled. The answer was given.
Q. BY MR. MESEREAU: Are you telling the jury that at some point -- excuse me. Let me start again.
As of today, you're telling this jury you've never told your mother what you claim Mr. Jackson did to you, right? 4852

A. I believe in counseling. I never told her specifics on -- that I was molested, but I did in counseling tell her that I was molested.
Q. Okay.
A. But it was in -- shoot. It was a crying time for --
Q. Okay. I'm not asking you about the details. Just answer my questions.
A. It was just hard for me to remember because I was crying.
Q. Okay.
A. So -- I was young, and I was 14 or 15.
Q. So when you told the jury earlier that you never told your mother about this, that wasn't true, right?
A. I'm sorry, I probably spoke quickly.
Q. So when you told that to the jury, that was not really correct, right?
MR. ZONEN: I'm going to object as vague. What is "not," or "that"?
THE COURT: The objection's overruled. I'll have the court reporter read the question back to you.
THE WITNESS: Okay.
(Record read.)
THE WITNESS: And when I told "that" being --
Q. BY MR. MESEREAU: Let me rephrase it. When you told the jury, in response to the 4853

prosecutor's questions, that you had never told your
mother you were molested, that wasn't true, right?
A. I was mistaken.
Q. Okay.
A. Yeah.
Q. Okay. In fact, you had told your mother
that you were molested, right?
A. Yeah, I must have misunderstood his question
with the -- with the details of it. I never told my
mom that I was molested three times by Michael
Jackson. My mom, I don't even think to this day,
knows that I was molested three times and the
specifics of it. If she does, then she does, and
that sucks.
Q. Your mother went on the T.V. show Hard Copy
in the early '90s, right?
A. Okay. I --
Q. Do you know if that's true?
A. She was on Hard Copy.
Q. She was on Hard Copy in 1993, was she not?
A. If you told me '94, I'd agree. I don't
know. I don't know the exact year. I do not.
Q. Are you telling the jury that before your
mother went on Hard Copy, you never discussed what
you claim Mr. Jackson did to you with your mother?
A. Yeah, I'm pretty sure that I never told my
mom that he molested me before Hard Copy.
Q. And before sheriffs came to talk to you for 4854

1 the first time, had you told anyone that you had
2 been molested by Michael Jackson?
3 A. I don't think so, no.
4 Q. They just kind of came one day and surprised
5 you?
6 (Laughter.)
7 A. Yeah.
8 THE COURT: Just a moment, Counsel.
9 (To the audience) I'm not going to put up
10 with that.
11 THE WITNESS: Thanks.
12 THE COURT: If there's any laughing again,
13 I'll remove people from the courtroom.
14 Go ahead, Counsel.
15 MR. MESEREAU: Thank you, Your Honor.
16 Q. You have -- you all right?
17 A. Yeah. I was just a little tense. Sorry.
18 Q. You have reviewed the tape and transcript of
19 your first interview with the sheriffs, correct?
20 A. Yes.
21 Q. And when did you review that interview?
22 A. Like when did I listen to the tapes again?
23 Is that what you're asking?
24 Q. Yes.
25 A. Sunday.
26 Q. And how did you get the tape?
27 A. Chris - I don't know his last name - gave
28 them to me. 4855

1 Q. Is that the lawyer?
2 A. No. He's not a lawyer, I don't think.
3 Q. Is he a sheriff?
4 A. It's a tall man.
5 Q. Is he a sheriff?
6 A. I don't know. I believe so.
7 Q. How did you run into him?
8 A. I met him when I met all these gentlemen.
9 Q. The prosecutors?
10 A. Correct.
11 Q. Okay. So Chris was with the prosecutors
12 when you met them last, right?
13 A. I'm sorry?
14 Q. Chris was with the prosecutors when you
15 spoke to the prosecutors, correct?
16 A. Yes.
17 Q. And Chris gave you a tape of your interview
18 from 1993, correct?
19 A. I believe that's the year, yes.
20 Q. And if you remember, who was at that
21 interview in 1993?
22 A. I don't remember. Two men. Detectives, I
23 believe.
24 Q. And where did it take place?
25 A. I already answered that to him.
26 Q. Would you please answer it again for me?
27 Where did it take place?
28 A. At the sheriff's station, or the probation -- 4856

I think it was the sheriff's.
Q. Was that in Santa Maria?
A. In Orcutt.
Q. In Orcutt, okay.
You were given a copy of the tape to listen to, right?
A. Right.
Q. And you were given a transcript of the tape to read, right?
A. Yeah.
Q. And you did that, right?
A. Yeah.
Q. And a Detective Russell Birchim from the Santa Barbara County Sheriff's Department was present for that interview, right?
A. I don't remember his name.
Q. Would it refresh your recollection if I just show you a copy of the transcript?
MR. ZONEN: I'll object as to which interview. Talking about the 1993 one, or the recent one where he reviewed the transcript?
MR. MESEREAU: I'm talking about the 1993 one.
MR. ZONEN: I'm sorry.
Q. BY MR. MESEREAU: Let's get back to the 1993 interview.
A. Okay.
Q. You have recently reviewed a transcript of 4857

that interview, right?
A. In the '93 interview?
Q. Yes.
A. The tape and the transcript?
Q. Yes.
A. Have I reviewed them both?
Q. Yes.
A. Didn't I answer you that already?
Q. Would you please clarify it? Because there's been some confusion.
A. Yes, I have.
Q. You have listened to the tape and you've read the transcript, right?
A. Correct.
Q. But as you sit here today, you're not sure who was at the interview with you in 1993, right?
A. I was 13 years old.
Q. Would it refresh your recollection if I show you a copy of the transcript with the names of the people who were with you?
A. Sure.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
MR. MESEREAU: Thank you.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to look at that transcript? Mr. Francia, have you had a chance to look at the transcript I just showed 4858

1 you?
2 A. Yes.
3 Q. Okay. Did it refresh your recollection
4 about who was there for that interview?
5 A. Yeah. I just read it. It said Vince and
6 Russell.
7 Q. Vince Neglia and Russell Birchim, right?
8 A. Correct.
9 Q. Okay. Okay. Now, did someone tell you to
10 review that transcript before you testified?
11 A. Yes.
12 Q. Who told you to review that transcript
13 before you testified?
14 A. I'm under some pressure. Mark -- it's not
15 Mark. It's Russ. I'm so bad with names.
16 Q. Is it Prosecutor Zonen, who just asked you
17 questions?
18 A. Yes.
19 Q. Okay. Okay. Did he tell you you'd be asked
20 questions about that?
21 A. About --
22 Q. What you said in that interview in 1993?
23 A. Yes.
24 Q. Okay. Did he tell you to study it carefully
25 and make sure you knew what you said and didn't say,
26 right?
27 A. Actually, he didn't say, "Study it
28 carefully." 4859

Q. Did he tell you to read it?
A. He told me to review it.
Q. Okay. Okay. Now, you were how old when you were interviewed in 1993?
A. I think on that, it says the date. I could tell you the -- I could tell you how old I was.
Q. Okay. The date was November 4th, 1993.
A. I was 13.
Q. 13. Okay. Is that the first time you were ever interviewed by any police officer regarding Michael Jackson?
A. Yes.
Q. Okay. Now, you told the police that you and Mr. Jackson were talking to one another in that hideout area, right?
A. I -- I was kind of banging my -- I told the police that I was --
Q. Talking to Mr. Jackson at a place you described as the hideout.
A. Yes, I have talked to Jackson at the place, at the hideout.
Q. And that was a place where Mr. Jackson used to go when he didn't want the public or the press or anyone knowing he was there, true?
A. I'm assuming that.
MR. ZONEN: Objection as speculative.
THE COURT: Just --
Q. BY MR. MESEREAU: Did Mr. Jackson ever tell 4860

you --
THE COURT: I haven't ruled on it.
MR. MESEREAU: Oh, I thought you had, Your Honor. Sorry.
THE COURT: I'll allow the question, and the answer was, "I assume that."
Go ahead, Counsel.
Q. BY MR. MESEREAU: Did Mr. Jackson tell you that this was a place that he didn't want the public or the press following him to?
A. I don't know.
Q. Okay. All right. In that interview, you told the police that you were sitting on Mr. Jackson's lap, right?
A. I'm sorry?
Q. In that interview, you told the police you were sitting on Mr. Jackson's lap, correct?
A. In the '93 11 -- is that this one that you're reviewing right now?
Q. Yes.
A. The one you showed me? Yes.
Q. Yes. And you told them that at one point, he started tickling you and you started tickling him, right?
A. Yeah.
Q. And then you told the police, "I have this blackout. I can't remember anything else," right?
A. Yeah. I -- I tried to black everything out. 4861

Q. I understand. But I just want to go forward and ask you some questions about it.
A. Oh, okay.
Q. But on that particular date, you told the police that you had blacked everything out after you and Mr. Jackson started tickling, right, tickling each other, correct?
A. Yeah.
Q. Okay. You told the police you knew that Michael Jackson had a reputation of being nice to kids, right?
A. I'm sorry?
Q. You told the police that Mr. Jackson had a reputation for being very nice to kids, right?
MR. ZONEN: Objection; hearsay.
THE COURT: Sustained.
Q. BY MR. MESEREAU: What did you tell the police about Mr. Jackson's reputation?
MR. ZONEN: Objection; irrelevant.
THE WITNESS: I don't remember.
MR. ZONEN: And hearsay.
THE COURT: Sustained.
Q. BY MR. MESEREAU: You were in that apartment because your mother brought you there, right?
A. My mom did bring me there to the hideout.
Q. She brought you there and she was working in the apartment, correct?
A. Yeah. 4862

Q. And how many rooms do you remember there being in that apartment?
A. I remember one, but I could be mistaken.
Q. The first time you claim you were improperly tickled, was that on a chair?
A. Yeah.
Q. And that was when your mom was cleaning the apartment, correct?
A. She wasn't in the room.
Q. She wasn't in the room then?
A. She was not in the room with me.
Q. You sure of that?
A. Yeah.
Q. Well, you told the police you had a blackout and didn't remember anything after -- after you and Mr. Jackson were tickling each other, right?
A. I blocked it out. I didn't blank it out. I just didn't never want to repeat that stuff again.
Q. Okay. Do you remember, in one of your police interviews, the police telling you, "This is what happened, right?" And you said, "Well, I'll have to work on that"? Do you remember using words like that?
A. No.
Q. Okay. Have you looked at the transcripts of both your police interviews?
A. No.
Q. Okay. Just looked at the one in '93? 4863

A. I believe so.
Q. Okay. Okay. Now, you told the police you didn't want to sit on the floor, right?
A. I don't know what you're talking about right now.
Q. Did you ever tell the police you wouldn't want to sit on Mr. Jackson's floor?
A. Are you talking about the hideout?
Q. Yes.
A. I -- yeah, I remember -- I don't remember saying that. I remember hearing that on the tape.
Q. You did hear it on the tape, right?
A. Yeah.
Q. And it's your voice, right? Right?
A. Yeah.
Q. Okay. You told the police....
Let's talk about the first incident you claim happened, okay?
A. Okay.
Q. Now, you claim you both were clothed, correct?
A. Yes.
Q. You claim you were sitting in Mr. Jackson's lap, right?
A. On one leg, yeah.
Q. Okay. And you claim he started tickling you, right?
A. Right. 4864

Q. You tickled back, correct?
A. Yeah.
Q. And you were watching cartoons, right?
A. Yeah.
Q. Had you ever watched cartoons with Mr. Jackson before?
A. I don't remember.
Q. Had you ever watched cartoons with him in Encino?
A. I'm sorry?
Q. Had you ever watched cartoons with Mr. Jackson in Encino?
A. I don't remember.
Q. Okay. Do you remember either Mr. Jackson tickling you or tickling him at the home in Encino?
A. I don't remember any of that in Encino.
Q. Where was your mother, if you know, when you say you were improperly tickled?
A. I don't.
Q. Did she come back at some point?
A. I had to have left there with my mother, so I think she did.
Q. And how old were you on that particular day?
A. I answered that already, and I thought seven and a half. Seven, eight.
Q. Okay. You told the jury that you tickled each other and then you went to the floor and you don't remember after that, correct? 4865

A. I don't remember after what?
Q. You went to the floor.
A. I don't remember after he was playing with my balls.
Q. Well, that's what you said later on.
Earlier interviews you denied that, didn't you?
MR. ZONEN: I think we're vague now.
THE WITNESS: Yeah.
MR. ZONEN: I'll object as vague.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Early in your interviews, you denied being touched in your private areas, didn't you?
A. Yeah. I was scared.
Q. They were pretty long interviews, weren't they?
A. I believe so. Yeah, they were. They were long in my time. To a kid, an hour's a long time.
Q. Do you remember in your first police interview in 1993 telling the police, "I'll just say this out flat. I don't remember him trying anything with me except for the tickling"? Do you remember that?
A. Do I remember saying that?
Q. Yes.
A. No. But I've heard that on the voice. Yeah, I was fighting them with everything I had.
Q. I understand. I understand. You told the 4866

police that at that apartment there was a humongous
T.V., right?
A. In what apartment?
Q. Mr. Jackson's apartment, where you say you
were improperly tickled, right?
A. The hideout?
Q. That's what you call the hideout. I'm
calling it the apartment. You call it the hideout,
right?
A. Okay. My mom called it the hideout. That's
why I called it the hideout.
Q. You told the police in 1993 there was a
humongous T.V., right?
A. I don't know.
Q. You said, "It was 46-inch, something like
it"?
MR. ZONEN: I'm going to object as to
hearsay.
THE WITNESS: I don't know.
THE COURT: Just a moment.
Sustained.
You need to wait until I rule on the
objection.
THE WITNESS: Oh, sorry.
THE COURT: Go ahead.
Q. BY MR. MESEREAU: Do you remember telling
the police in that interview, "We started tickling
each other and my mom just grabbed me and, 'Let's 4867

go'"?
A. I don't remember.
Q. Would it refresh your recollection if I just show you a page of it?
A. Probably would.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: You may.
MR. ZONEN: What page?
MR. MESEREAU: It would be page 26.
MR. ZONEN: Thank you.
THE WITNESS: Okay. I see that.
Q. BY MR. MESEREAU: Have you had a chance to look at that? Does it refresh your recollection about what you told the police in that interview?
A. No, not really.
Q. Well, on a number of occasions, you told them, "We tickled each other and then I left," didn't you, words to that effect?
A. Yeah. Again, I was fighting with everything I had.
Q. I'm not asking you what you were doing. I'm just asking if that's true, okay? On a number of occasions, you said, "We just tickled each other and then I left," right?
A. Okay.
Q. Is that correct?
A. Yes. And then I also told them that he molested me. 4868

Q. On many occasions in that interview you denied being molested, didn't you?
A. Yeah, at first.
Q. And the police kept leaning on you to admit you had been molested, true?
A. It wasn't like a twisting the arm. It was -- I was again fighting. I didn't want to be embarrassed at school. I didn't want to be embarrassed anywhere. I was 13.
Q. So you were lying to the police?
A. Yeah. I was at first.
Q. Okay. Now, shortly after this -- let me rephrase that.
How long after this did you and your mother get lawyers and threaten to sue Mr. Jackson; do you know?
MR. ZONEN: Objection as compound, "you and your mother." And vague.
THE COURT: Sustained. Compound.
Q. BY MR. MESEREAU: Do you remember in that interview being asked, "Is Mr. Jackson touchy-feely?" And you said, "I don't remember. I distinctly don't remember"?
A. I don't remember that interview.
Q. Would it refresh your recollection if I show you that page?
A. If you show me the page, I'm still not going to remember. 4869

Q. Well, you've --
A. I could -- if it says on the transcript, then I'll say, okay, I said it when I was younger. But I don't remember right now.
Q. But you've listened to the tape and read the transcript to prepare for today, correct?
A. This is pretty nerve-racking being here right now, so for me to say I'm prepared for this? I'm not prepared for this.
Q. Well, I do have to ask you questions, you understand that?
A. I totally understand.
Q. Okay. Now, you told police in that interview, they asked you if Mr. Jackson was touchy-feely, and you said, "I don't remember. I distinctly don't remember." Remember that?
A. Do I remember that? No, I don't remember that.
Q. Might it refresh your recollection if I just show you that page?
A. We just did this again.
MR. ZONEN: Objection; asked and answered.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Remember telling the police you just remember the tickling; it was fun?
A. It was fun to be tickled, to laugh. That's fun.
Q. Okay. That's what you told the police in 4870

that interview, correct?
A. What I'm telling you right now is that it's fun to laugh. I don't know what I told them.
Q. Might it refresh your recollection if I just show you a page of transcript?
A. I'll agree with it if it says it on there, but I -- to remember that all right now, I don't remember.
Q. You told the police Mr. Jackson never kissed you, right?
A. I remember saying that. I remember hearing that on the tape.
Q. And you told them that he just hugged you goodbye when you left with your mom, right?
A. At first. I believe that's in the very beginning of the transcript.
Q. You were asked if you had met Brooke Shields by the police. Do you remember that?
MR. ZONEN: Objection; hearsay.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Did you ever meet Brooke Shields?
MR. ZONEN: Objection; irrelevant.
THE COURT: Overruled.
You may answer.
THE WITNESS: Heck if I know.
Q. BY MR. MESEREAU: Do you remember whether or not Mr. Jackson was dating Brooke Shields at that 4871

point in his life?
MR. ZONEN: Objection; speculative.
THE COURT: You may answer.
THE WITNESS: When I was --
THE COURT: The question is, do you know?
Just "yes" or "no."
THE WITNESS: Okay. I don't know.
Q. BY MR. MESEREAU: Now, at this point, do you know whether or not you've ever obtained money from Mr. Jackson?
A. One more time.
Q. At this point in time, do you know whether or not you've ever obtained money from Mr. Jackson other than what you just described?
A. Other than the money that he put down my pants?
Q. Yes.
A. Yes.
Q. At some point you and your mother settled a case with Mr. Jackson, correct?
A. I don't remember signing papers.
Q. You're how old today?
A. I'm 24.
Q. And you're telling the jury you don't know whether you and your mother ever reached a financial settlement with Mr. Jackson?
A. There was a financial settlement.
Q. Okay. And when did you learn about that? 4872

A. I believe I was 17.
Q. Do you remember signing documents in that?
A. At 17, I don't remember.
Q. Okay. Do you remember looking at that agreement?
A. At 17, I did not look at that agreement.
Q. And now, at 17, you knew that your mother had already gone on television attacking Mr. Jackson, right?
A. When she was on Hard Copy, is that what you're talking about?
Q. Yes.
A. Yes. At 17, I heard she had already been on Hard Copy.
Q. And at some point she met with Attorney Larry Feldman, did she not?
A. I don't know.
Q. Okay. But at 17, you certainly knew that your mother had hired attorneys who were threatening to sue Mr. Jackson if they didn't get some money, right?
A. No, I do not.
Q. Didn't know anything about that at 17?
A. Call me a stupid kid. I didn't know.
Q. Okay. But you certainly learned about it at some point?
A. Yeah. I learned about it at some point.
Q. Which did you learn about the fact that your 4873

lawyers were threatening to go public and sue Mr. Jackson unless you and your mother got money?
A. All of that stuff I don't know about. I knew that there was a settlement. I don't know how they fought, or what they argued about, or what they talked about.
Q. You've never discussed it with your mom?
A. About -- I have never discussed what, the settlement?
Q. Yes.
A. Yes, I have.
Q. Have you ever discussed how the settlement came about with your mom?
A. No.
Q. Okay. Okay. And do you remember reading a settlement document?
MR. ZONEN: Objection; asked and answered.
THE COURT: Sustained.
Q. BY MR. MESEREAU: You were asked to sign a settlement document at some point, right?
A. Probably.
Q. And in that document, Mr. Jackson denied doing anything wrong, correct?
MR. ZONEN: Objection; assumes facts not in evidence.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you know whether or not in that settlement document you signed Mr. Jackson 4874

denies ever doing anything wrong?
MR. ZONEN: Objection. No evidence he signed it, he viewed a document or signed a document.
THE COURT: The objection is sustained. He said -- when you asked him if he signed it, he said, "Probably." So you haven't established that he signed it.
MR. MESEREAU: Okay.
Q. At the age of 24, and as you sit here today, you don't know if you ever signed a settlement document with Mr. Jackson?
A. That is correct.
Q. As you sit here today, at the age of 24, do you know if your mother ever signed a settlement document with Mr. Jackson?
A. I think she did.
Q. Do you know if any money has come your way through a settlement with Mr. Jackson?
A. Money has, yes.
Q. Okay. And when did you first learn about that?
A. I answered that I thought. At 17.
Q. Okay. And you've had many discussions with your mom about that, right?
A. No. We -- me and my mom have a weird relationship. Well, not a weird relationship. We just don't talk about much stuff. 4875

Q. Okay. Do you remember constantly telling
the people who interviewed you in 1993 that you
didn't remember Mr. Jackson doing anything improper?
A. I don't remember now, but I -- in listening
to the tapes, I remember when I was -- at first I
was denying everything.
Q. You've told the police that he tickled you,
you tickled him, you both laughed, and then you went
home, right, early in the interview?
A. I think I told him that I blacked it out
or -- yeah.
Q. And you told the police at one point as they
tried to get you to say he had molested you, you
said, "If I don't remember, I don't remember,"
right?
A. Yeah.
Q. The police kept trying to tell you to say
that Mr. Jackson put his hands somewhere that was
improper, right?
A. No, they didn't.
Q. Do you remember these long paragraph
questions where they'd say, essentially, "Admit to
us he did something improper"?
A. They said, "If he did something, then tell
us." That's what I remember. You could give me
that, and I'll read it.
Q. Would it refresh your recollection if I show
you one of the paragraph questions they asked you? 4876

A. Well, this is -- I'm telling you what I remember. It's not going to change my memory.
Q. It's not going to change your memory to look at the transcript?
A. No. What I remember is them telling me, "If he did something, then tell us." And I was, "No, I'm not gay." I was fighting it again.
Q. You repeatedly told them, "I have nothing to tell you. I don't remember anything," right?
A. I'm sorry?
Q. You repeatedly told them you had nothing to tell them because you didn't remember anything improper?
A. In the very beginning, yeah.
Q. Yes. Now, in your response to the prosecutor's questions about the first time you say you were improperly touched - okay? -
A. Okay.
Q. -- did you say words to the effect, "At some point we were on the floor"?
A. I believe I did, yeah.
Q. Okay. And then you said, in response to the prosecutor's questions, "I can't remember anything after that," right?
A. I'm sorry?
Q. After saying that you went to the floor, earlier today --
A. Okay. 4877

Q. -- you then said, “I don’t remember anything after that,” correct?
MR. ZONEN: I’m going to object as asked and answered.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you remember anything that happened after you went to the floor during the first time you say you were improperly touched?
A. Isn’t that the same question that you just asked?
MR. MESEREAU: Your Honor, could the witness be instructed to respond?
MR. ZONEN: I’m not certain as to the --
THE COURT: Just a moment.
(To the witness) The problem we have is you don’t get to object to his questions. If the District Attorney wants to object, he can. If the District Attorney doesn’t object, then you just answer the question.
THE WITNESS: Okay.
THE COURT: Just a moment. I’ll have the question read back.
MR. MESEREAU: Thank you, Your Honor.
THE WITNESS: Sorry.
(Record read.)
THE WITNESS: After he touched me? Like in my genitalia?
Q. BY MR. MESEREAU: Did you then go to the 4878

1 floor?
2 A. I thought we were already on the floor.
3 THE COURT: You're asking him a different
4 question.
5 MR. MESEREAU: Okay.
6 Q. Do you want the first question? Do you want
7 the first question read back again?
8 I'll start again, Your Honor.
9 THE COURT: Okay.
10 MR. MESEREAU: Okay.
11 Q. You said you were sitting in a chair with
12 Mr. Jackson, right?
13 A. Okay. I was on his lap, yeah.
14 Q. You said you were tickling each other at one
15 point, right?
16 A. Right.
17 Q. And at one point you said you went to the
18 floor, correct?
19 A. Right.
20 Q. Were you tickling each other on the floor,
21 as far as you remember?
22 A. As far as I remember, I believe so, yeah.
23 Q. And there was a lot of laughing going on,
24 right?
25 A. Yeah. Yeah.
26 Q. And then at some point your mom came back,
27 right?
28 A. Did I say that? 4879

Q. I'm just asking you.
THE COURT: Just answer.
THE WITNESS: No, I'm literally asking you.
No, I don't think I said that.
Q. BY MR. MESEREAU: Didn't she come back at some point and then take you home?
A. She must have, yeah. She had to have taken me home.
Q. In your interview in 1993, the police asked you if Mr. Jackson rubbed your penis, and you said, "No," correct?
A. Yeah.
Q. Right?
A. In the beginning, yeah.
Q. Well, pretty late in the interview, wasn't it?
A. I have no clue.
Q. You said, "It was a tickling. He didn't rub me there," correct?
A. Oh. Okay. If we're going that --
Q. Is that right?
A. Yeah, he was playing with my stuff, not rubbing it. In a stroking manner.
Q. I know the point you're trying to make to the jury, but I'm just asking you the facts, okay?
MR. ZONEN: I think that's argumentative.
THE COURT: Sustained.
Q. BY MR. MESEREAU: You told the police that, 4880

1 “He never rubbed me there. It was just a tickling,”
2 correct?
3 MR. ZONEN: Objection; asked and answered.
4 THE COURT: Overruled.
5 You may answer.
6 THE WITNESS: One more time.
7 THE COURT: I’ll have the court reporter....
8 (Record read.)
9 THE WITNESS: I don’t remember.
10 Q. BY MR. MESEREAU: Would it refresh your
11 recollection if I show you a transcript?
12 A. I don’t remember. I’ll say I don’t
13 remember, but I’ll agree with what the transcript
14 says.
15 Q. Okay. Well, I’m not trying to put words in
16 your mouth. Would you like to look at it?
17 A. Okay.
18 MR. MESEREAU: May I approach, Your Honor?
19 THE COURT: All right.
20 MR. ZONEN: What page, Counsel?
21 MR. MESEREAU: 45.
22 MR. ZONEN: Thank you.
23 THE WITNESS: Okay.
24 Q. BY MR. MESEREAU: Have you had a chance to
25 look at that transcript?
26 A. I did.
27 Q. Does it refresh your recollection about what
28 you told the police in that interview? 4881

A. No. But in reading it, it said, “Well, yeah” in the very beginning of that sentence.
Q. It says, “Well, yeah, he’s not rubbing it, but tickling,” right?
A. That’s what it said, I believe.
Q. And you said it was on top of your pants; is that correct?
A. The first time --
Q. Yes.
A. -- that he molested me?
Q. The first time you say he molested you, you say it was on top of your pants, right?
A. Pants or shorts. My clothing.
Q. You said he never put his hands in your shorts, right?
A. Right now? Do I say he never -- no, he did it at the very end. The last time he molested me, he did put his hands in my shorts.
Q. Okay. We’re talking about the first time.
A. The first time he didn’t.
Q. Okay. And how much time elapsed, if you know, between the first time you say you were touched and the second time?
A. I’m guessing a year.
Q. And how much time elapsed between the second time you claim you were improperly touched and the third time?
A. I’m guessing two years. 4882

Q. Okay. So let me just, for the record, get your ages each time. The first time you were around seven, right?
A. Sounds about right. Seven, seven and a half.
Q. The next time you were around eight?
A. Eight, eight and a half, or nine. Yeah.
Q. And the third time you're how old, do you think?
A. Ten, ten and a half.
Q. Okay. And did you have any contact with Mr. Jackson in between those three events you've described?
A. I believe I did.
Q. Now, let's talk about contact between the first event that you've described and the second. What kind of contact did you have with Mr. Jackson?
A. Actually, between the first time he molested me and the second time he molested me, I don't think there was contact between those two times.
Q. Now, has someone told you to make sure you use the word "molest" repeatedly in your testimony?
A. No.
Q. Have you discussed your testimony with any lawyer before you came in today?
A. No.
Q. Discussed it with your mom before you came in today? 4883

A. No.
Q. Not at all?
A. Me and my mom?
Q. Yeah.
A. I haven't -- no. I haven't talked to her much.
Q. Does she know you're here today, to your knowledge?
A. Yeah, I think she does.
Q. You're not sure?
A. I'm pretty sure she does.
Q. Okay. Have you talked to her about it?
A. About me coming on the stand?
Q. Yes.
A. No, I have not.
Q. Okay. Now, the prosecutor asked you how long the tickling continued the first time, right?
A. Okay. Yes.
Q. But you didn't time how long the tickling continued?
A. No, I didn't have a stopwatch.
Q. You don't really know how long it continued, do you?
A. I could go by Woody Woodpecker, but -- I could go by cartoons, but I didn't have a -- I probably did have a watch on, but I didn't time it.
Q. You've told the police nothing happened skin to skin, right? 4884

A. At first.
Q. Well, you still say nothing -- there was no touching skin to skin --
MR. ZONEN: Objection.
Q. BY MR. MESEREAU: -- in the first event, right?
MR. ZONEN: Withdraw the objection.
THE WITNESS: Are we talking -- yes, we are talking the first event, so -- correct?
Q. BY MR. MESEREAU: Yes. No skin-to-skin touching, correct?
A. Correct. I just sometimes get confused if you're talking first event, second event, third event.
Q. Unless I say otherwise, let's assume I'm talking about the first event. Okay?
A. Okay.
Q. Now, after that first event happened --
A. Okay.
Q. -- you claim you never told anyone about it, right?
A. Correct.
Q. After the second event happened, you claim you never told anyone about it, right?
A. After the second time it happened?
Q. Yes.
A. Yes, I did not.
Q. After the third time it happened, you claim 4885

you never told anyone about it, and then suddenly
the police came one day, right?
A. Right.
Q. Okay. Between the first and the second
event, how often did you see Michael Jackson?
A. Between the first and the second?
Q. Yes.
A. I thought I said none. I didn't think I saw
him in between 1 and 2.
Q. You didn't see him at all?
A. I don't think so. I don't remember.
Q. Okay. I mean, your mother still was working
for Mr. Jackson, right?
A. Yeah.
Q. And she used to clean his house, right?
A. Clean the mansion, yeah.
Q. And would you go over to the mansion with
her, still, from time to time?
A. At times, yeah.
Q. Do you recall seeing Mr. Jackson anytime
after -- or excuse me, between the first and the
second event?
A. I don't recall it.
Q. Okay. The second event you've described --
actually, let me go back to the first one.
You said you don't remember how it felt, you
were too young, right?
A. I'm sorry? 4886

Q. Yeah. Going back to the first event.
A. Okay.
Q. Correct me if I'm wrong, I think you said,
"I don't remember how it felt. I was too young,"
right?
A. I believe that's what I said, yeah. When he
was doing his interview or --
Q. Pardon me?
A. -- when he was asking me the questions?
Q. Yes. Yes.
A. Yeah.
Q. Okay. And you don't recall -- excuse me.
And the year you think that happened was
when? When do you think?
A. The first time?
Q. Yes, please.
A. I'm thinking '87, '88.
Q. '87, '88?
A. Yeah, around there.
Q. Okay. 17, 18 years ago, right?
A. Right.
Q. Okay.
A. Well, yeah.
Q. You said that you've done some therapy,
right?
A. That I've gone through counseling, yeah.
Q. Yes. And without going into what you said,
because that's confidential -- 4887

A. Okay.
Q. -- have you done anything, exercises or anything, to try and refresh your memory about what happened in '87 or '88?
A. No.
Q. Okay. And has any representative of the police department been involved in any of your counseling sessions?
A. No, I don't think so. Well, there was the one time that the -- that I first met Mr. Sneddon, I think that's his name. And it wasn't a counseling session. But Mike Craft, which was my counselor, was there.
Q. Was there with Mr. Sneddon present?
A. I think he was there, but I was 13.
Q. Okay. And to your knowledge, was Mr. Sneddon talking to your counselor?
A. I don't know.
Q. Okay. This is 12 years ago, approximately?
A. In '93.
Q. Okay. Okay.
A. Or '94.
Q. Okay. But you don't know what your counselor or Mr. Sneddon said to each other, right? You wouldn't know?
A. I wouldn't know.
Q. Okay. Do you know how long Mr. Sneddon and your counselor met? 4888

MR. ZONEN: Objection; assumes facts not in evidence, that they met.
THE COURT: Overruled.
You may answer.
THE WITNESS: I don't even know if they met.
I don't even -- well, they had to have met because they were in the same room, if they were in the same room. But I don't know.
Q. BY MR. MESEREAU: Do you know where they were in the same room?
A. Yeah, when they were in front of me.
Q. Do you know where that room was?
A. Yeah, it was in where I got my counseling.
It was my counselor's office.
Q. So Mr. Sneddon came to your counselor's office, correct?
A. That's what it -- I'm telling you this, because I think I remember meeting him there.
Q. Okay. Do you know if your counselor's been in touch with Mr. Sneddon?
A. I don't.
Q. Do you know if he's spoken to Mr. Sneddon at any time other than that day?
A. I don't.
Q. Okay. All right. Now, the second time you claim you were improperly tickled, you said you were lying on top of a sleeping bag, correct?
A. In or on, yeah. 4889

Q. Well, you told the police it was on top.
You were not in, right?
A. I think it says that on the transcripts.
Q. Okay. And that was a large sleeping bag
that took up most of the floor, correct, as far as
you remember?
A. I can't see a sleeping bag taking up the
whole floor in a room, now, because it's gigantic.
But I think I said that when I was younger.
Q. Okay. Do you remember mentioning Steven
Segall to the police?
A. Yeah, I do.
Q. And why did you Steven Segall?
A. Why did I mention him? I don't know.
Because I played pool against him, I think.
Q. Was that with Michael Jackson?
A. I think he was there.
Q. Okay. Was that at Neverland; do you know?
A. I think it was -- yeah, I'm pretty sure it
was at Neverland. It was at Neverland.
Q. Now, in the second event that you've
described, you also claim that there was no
skin-to-skin touching, correct?
A. On the second event, I don't -- yes, that is
what I claim.
Q. And what you said was that that also began
like tickling, correct?
A. Yeah. 4890

Q. Okay. You were tickling each other, right?
A. I'm sorry?
Q. You were tickling each other at that point?
A. Yeah, it started off with him tickling me.
Q. Okay. And that was at the -- what you call the hideout as well, right, the second event?
A. Yes.
Q. Okay. Where was your mom at that point?
A. I don't know. Not in the room.
Q. Okay. All right. You're on the floor, and you're in that position you described, right?
A. What -- when he's kind of spooning in and holding me? Yeah.
Q. And he starts tickling you, right?
A. Correct.
Q. You tickle him back, right?
A. Probably.
Q. You're watching television, right?
A. Probably, yeah.
Q. Okay.
A. Yeah. Well, I mean -- I'm sorry. I am watching T.V., but I don't know whether I'm tickling him back or watching T.V.
Q. You're both laughing, right?
A. Probably.
Q. And then you say at some point he improperly tickled you in your private area, correct?
A. Yeah, he did. 4891

Q. Do you remember telling the police it was --
it was no more than a 30-second thing?
A. I don't remember that.
Q. Would it refresh your recollection if I show
you a portion of the transcript of your police
interview?
A. It wouldn't. I could look at it again, but
it wouldn't make me remember.
Q. Do you want to give it a try?
A. Okay.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
Q. BY MR. MESEREAU: Have you had a chance to
look at that page?
A. I did.
Q. Does it refresh your recollection about what
you told the police?
A. No.
Q. You don't remember their asking you if it
was just like a passing thing, and you said, "It's
no more than a 30-second thing"?
THE COURT: Counsel, that's not how you
refresh recollection. He said it didn't refresh his
recollection.
MR. MESEREAU: Okay.
Q. Do you remember telling the police, when
they asked you how long it was, you don't know, "We
were just laughing the whole time"? 4892

A. No, I don't remember that.
Q. Okay. Okay. Do you remember being asked if anything improper happened at the ranch, and you said, "I was around too many people"?
A. I'm sorry?
Q. Do you remember police saying to you, "Did anything improper ever happen at the ranch?" And you said, "I was around too many people"?
A. I remember hearing that on the tape.
Q. Okay. But you don't remember saying that?
A. I don't remember saying that.
Q. Do you remember hearing your voice say that on the tape?
A. Correct.
Q. And in that 1993 interview, when it came to talking about what happened at the arcade, you didn't know if he'd really touched you improperly, right?
A. I knew.
Q. Well, you kept responding, "I don't know," and then you'd say, "If he really did touch, it was in the arcade"?
A. No --
Q. And you were asked, "Do you think he did it?" And you said, "I don't know"?
A. I knew.
Q. But you told the police you didn't know, correct? 4893

A. I don't remember. If you bring that thing to me again, I'm going to -- yes.
Q. Would it refresh your recollection to look at it?
A. Yes, bring it over.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: You should just drop one off. Okay.
MR. ZONEN: What page, Counsel?
MR. MESEREAU: That would be 57 and 58.
MR. ZONEN: Thank you.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to look at those pages?
A. I did.
Q. Does looking at those pages refresh your recollection about what you have told the police --
A. No.
Q. -- in '93?
A. I was 13. Eleven years ago.
Q. You weren't even sure you were tickled at all. Remember that?
A. I don't remember that I -- I knew.
Q. Remember telling the police, "You guys are pushy"?
A. Yeah. I remember telling the police that.
Q. Okay. And after they kept pushing you, you 4894

finally said, “You know, I think he did tickle me,”
right?
A. No.
Q. Do you remember that? Do you remember at
first saying you didn’t know, and then after --
A. Yeah, I remember saying at first, “I don’t
know.”
Q. And after telling the police, “You guys are
pushy,” you eventually finally said, “Yes, he
tickled me,” right?
A. I believe that’s how it went.
Q. Okay. You kind of went back and forth
during the interview, didn’t you? One second you’d
say, “He tickled me,” and the next second you’d say
you’re not sure, right?
A. I was trying to figure out how to get out of
there.
Q. I understand. And you remember exactly how
you felt in 1993 during the interview, right?
A. The feeling of, yeah, crying and crappiness.
Q. Okay. Do you remember the police kept
trying to get you to say he’s a molester?
A. No.
Q. Would it refresh your recollection if I show
you what one officer said to you about that?
A. Bring it over.
MR. MESEREAU: May I approach?
MR. ZONEN: Perhaps the witness could 4895

indicate whether it would refresh his recollection.
THE WITNESS: It wouldn't.
THE COURT: When he said "Bring it over,"
that sort of means like he'll see if it refreshes
his recollection.
THE WITNESS: Okay.
THE COURT: It's a shortcut. Go ahead.
MR. MESEREAU: Thank you, Your Honor.
THE COURT: We're down to the last seconds
here. Run.
(Laughter.)
MR. ZONEN: What page, Counsel?
MR. MESEREAU: 60.
MR. ZONEN: What line, please? It's not
numbered. Never mind.
MR. MESEREAU: Towards the bottom. Towards
the bottom.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: You're 13 years old.
You're sitting there, and one officer said to you --
THE COURT: Wait a minute now. Are you going
to ask him if it refreshes his memory?
Q. BY MR. MESEREAU: Have you had a chance to
look at that transcript? Does it refresh your
recollection that an officer looked at you said --
THE COURT: Just a moment, Counsel.
MR. MESEREAU: Okay.
THE COURT: He said, no, it didn't refresh 4896

his recollection.
All right. This is the end of the day.
(Laughter.)
See you tomorrow.
THE COURT: Go to bed one hour early.
(The proceedings adjourned at 2:30 p.m.)
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REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE)
OF CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify:

That the foregoing pages 4702 through 4897 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on April 4, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California, April 4, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304